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RECOMMENDATIONS FOR FURTHER ACTION

DATE: August 26, 1988

PREPARED BY: Alfred Wanger

DHS, Region 2

SITE: Proto Mold Manufacturing

1390 Old Bayshore Road

San Jose, California 95112

EPA ID#: CAD 98 235 9101

ASPIS ID#: 43-32-0041

Initial DHS Conclusions and Recommendations for Further Action:

a. Site Description:

Proto Mold Manufacturing is located at 1390 Old Bayshore Road, San Jose, CA (see Figure 1, Site Location Map). The site encompasses approximately 1.25 acres of land in an industrial area of San Jose (1). There are two buildings on the property, which have been used in the past by a variety of businesses, and an open rear portion of the property (see Figure 2, Site Map) (2). There are currently no operations at the site.

The site has been occupied since before 1950 (3). The site was owned by Clyde McCoy (now deceased) who operated a petroleum distributing company called "Pyro Penn" (3). The site was purchased in 1957 by Anton Pannutti (3). Pannutti operated a cosmetics and home cleaner manufacturing company at the site from approximately 1952 until 1978 (3). Several other companies leased space from Pannutti and operated at the Proto Mold facility including: Proto Mold Manufacturing (an injection molded plastics company manufacturing small plastic caps for smallplastic containers); Bottles and Alhambra Water Services; Construction Barricade MCS Chemical Supplies (janitorial and cleaning supplies); Delano Welding, and Ed Dillon (woodwork and cabinetry) (3).

No information is available regarding the disposal practices of either Pannutti's, or the Proto Mold Manufacturing operations. However, surviving members of the Pannutti family stated that "bad" or "off spec" batches of product were remixed and reprocessed rather than disposed of off-site (3,4).

Earnest Nakaji, owner of San Jose Concrete Pipe Company which is adjacent to the site, is purchasing the Proto Mold property to expand his facility (5).

This site had been on the DHS Expenditure Plan for the Hazardous Substances Cleanup Bond Act of 1984 (BEP) since 1986 (6). As of

October 13, 1988, DHS has certified the remediation of the site (7).

Apparent Problem

The site was identified by the Abandoned Site Program of DHS in 1981 (1). A driveby of the site observed two dozen drums labeled Sodium Perborate Tetrahydrate, numerous five gallon cans, and ceramic debris in the rear portion of the property (1). The owners could not be located and the site was referred to the enforcement unit of DHS for further action (1). There is no information regarding any follow up enforcement action regarding this referral.

A site inspection was conducted by DHS on March 6, 1986, to assess the number of drums, their contents (if possible), and obtain information regarding the history of the site (4). Samples of the drums labeled "Sodium Perborate Tetrahydrate" were obtained and analyzed (4,8). Test results indicated that the drums contained hand soap (8).

As a result of that inspection DHS directed the Pannutti estate to submit a sampling and analysis plan for the characterization of the drums stored on-site on March 25, 1986 (9). This directive was amended on December 3, 1986, to allow for the removal of drums by a company experienced with handling hazardous waste, and the removal be accompanied by sampling and analysis of drum contents (10). Additionally, DHS requested the submittal of a soil sampling plan to determine whether there was any soil contamination (10). The site was added to the DHS Expenditure Plan for the Hazardous Substances Cleanup Bond Act of 1984 (BEP) on October 3, 1986 (6).

The Pannutti estate hired IT Corporation to conduct the drum removal and soil sampling (11). Under DHS oversight, approximately 90 drums were analyzed by HAZCAT and composite samples from these drums were analyzed (2). Samples of drum contents revealed phenols as the only hazardous material detected (2). Phenols were detected in 6 drums (2). All drums were removed by July 22, 1988, and disposed of off-site (2).

A former workshop inside the main building was found to contain an old inventory of laboratory chemicals (2). These chemicals, which were used in the manufacture of cosmetics and cleaners, were inventoried and sold to Mr. Ed Mesiti (12,13).

Post removal soil sampling was conducted for phenols in areas where the drums containing phenols (2). No soil contamination was detected (2). No hazardous materials remain at the site, and there has been no contamination of on-site soils detected (2). As of October 13, 1988, DHS has certified the remediation of the site, and is removing the site from the BEP (7).

HRS Factors:

Observed Release

There has not been an observed release to groundwater, surface water, or the air. There has been no contamination of soils at the site. Therefore, there is no potential release of contaminants to the environment. Because there is no observed release, no potential release of contaminants, and no target populations, HRS factors will not be evaluated.

Conclusions and Recommendations

The Proto Mold Manufacturing site, at 1390 Old Bayshore Road, San Jose, California, was involved in cosmetics and home cleaner manufacturing from approximately 1952 until 1978. Several other companies operated before, during, and after the cosmetics and home cleaner manufacturing including an injection molded plastics company (manufacturing small plastic caps for Alhambra Water Bottles and small plastic containers); Construction Barricade Services; MCS Chemical Supplies (janitorial and cleaning supplies); Delano Welding, and Ed Dillon (woodwork cabinetry).

Approximately 90 drums were discovered in the rear portion of the property by the DHS Abandoned Site Program. Sampling revealed only phenols in six of the drums, and no soil contamination was detected. All drums were removed and disposed of off-site under DHS oversight. DHS has certified the remediation of the site and is removing the site from the DHS BEP.

EPA Recommendation for Further Action:

No Further Action under CERCLA.

DHS Recommendation for Further Action:

No Further Action. The remediation of the site has been certified by DHS (October 13, 1988). The site is being removed from the BEP.

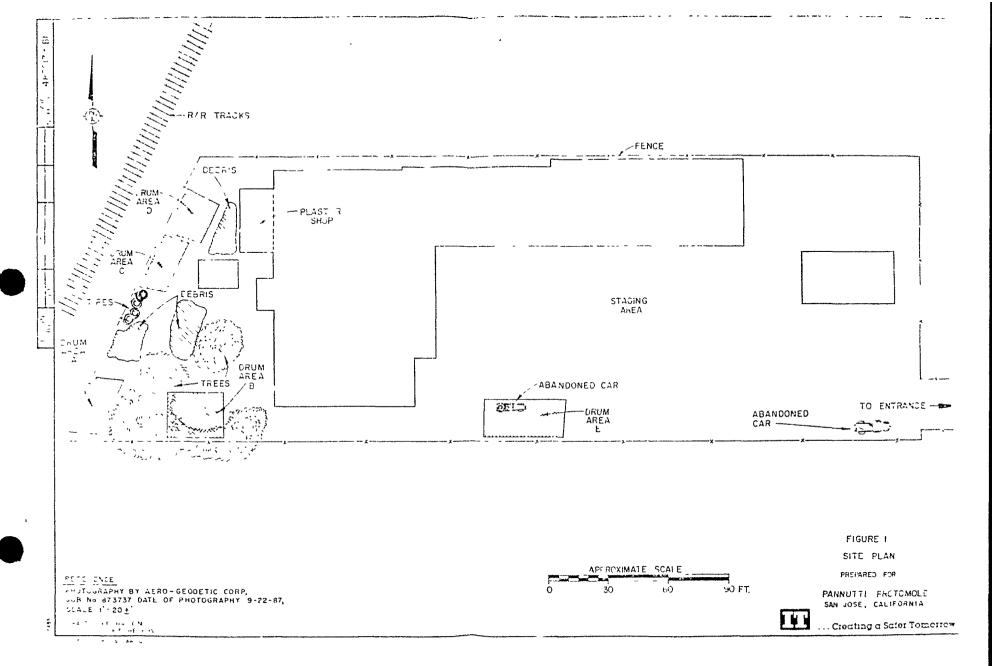


FIGURE 2: SITE MAP

Reference #2

PRELIMINARY ASSESSMENT CONTACT LOG

Facility Name: Proto Mold Manufacturing
EPA ID#: CAD 98 235 9101
ASPIS ID#: 43-32-0041

Name	Affiliation	Phone	Date	Information
Al Wanger	DHS Region 2	(415) 540-3401	8/3/88	DHS Files Reviewed
Receptionist	SF Bay RWQCB	(415) 464-1255	8/22/88	No File on site
Lee Esquibel	Santa Clara Department of Environmental Health	(408) 299-6930	8/22/88	Only Copies of DHS Correspondence in File

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REFERENCES

- 1. DHS, Abandoned Site Program Information System; 9/30/88
- 2. DHS Files: Letter and Report to Al Wanger, DHS, from Jim Reid, IT Corporation, Reference Protomold "De-Listing"; August 9, 1988.
- 3. DHS Files: Letter to Gabriel Dieb, IT Corporation, from Sahnta Lee Pannutti, September 28, 1987.
- 4. DHS Files: Memo to File from Denise Kato, DHS, regarding site visit, March 12, 1986.
- 5. DHS Files: Memo of Call, Telephone communication between Al Wanger, DHS, and Marge Bosetti, Bosetti Properties, May 27, 1987.
- 6. DHS Files: Report of Hazardous Substances Cleanup Bond Act Expenditure Plan Modification, October 3, 1986.
- 7. DHS Files: Remedial Action Certification Form, October 13, 1988.
- 8. DHS Files: Hazardous Substances Analysis Request, March 6, 1986.
- 9. DHS Files: Letter to Tony Pannutti from Dwight Hoenig, DHS, March 25, 1986.
- 10. DHS Files: Letter to Tony Pannutti from Jerome R. Marcotte, DHS, December 3, 1986.
- 11. DHS Files: Letter and Workplan to Robert Crandall, DHS, from Russell J. Enos, IT Corporation, April 13, 1987.
- 12. DHS Files: Letter to Sahnta Pannutti from Al Wanger, DHS, March 22, 1988.
- 13. DHS Files: Letter and Report to Al Wanger, DHS, from Jim Reid, IT Corporation, May 12, 1988.

REFERENCE #1

(09/30/88)

ABANDONED SITE PROGRAM INFORMATION SYSTEM FACILITY PROFILE REPORT

PAGE 3

COUNTY: SANTA CLARA

REGION: NORTH COAST CALIFORNIA

FILE NUMBER FACILITY

42-32-0044 PROTO MOLD MANUFACTURING

1390 OLD BAYSHORE RIGHWAY

SAN JOSE, CA 05112

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REFERENCE #2



August 4, 1988

Mr. Al Wanger
Department of Health Services
2151 Berkeley Way
Berkeley, CA. 94704



REFERENCE: PANNUTTI PROTOMOLD "DE-LISTING"

ITC PROJECT NO. 480017; FILE NO. 86-0004

Dear Mr. Wanger:

International Technology's initial proposal for the Pannutti/Protomold consisted of a three phase scope of work:

Phase I - Environmental Investigation to Verify if Contamination Exists

Phase II - Development of a Corrective Action Plan

Phase III - Implementation of the Corrective Action Plan

We are pleased to inform you that as of July 29, 1988, all phases have been completed. Enclosed for your review is a detailed summary of the work performed by IT. We believe that all suspected hazardous material has been removed from the site. We hope that this summary will complete IT's involvement with the project and allow the DHS to "de-list" the site.

If you have any questions or require additional information, please contact me at (415)372-9100.

Sincerely.

James C. Reid

Environmental Specialist

JCR:ps MA:FLR:0077 Enclosures

PHASE I - ENVIRONMENTAL INVESTIGATION TO VERIFY IF CONTAMINATION EXISTS

Phase I consisted of six specific tasks as outlined in the April 13, 1987 proposal letter. The following is a list of the Phase I tasks as completed by IT:

Task 1 - Data Collection, Meetings, Data Review

Site walks and meetings with the buyers, sellers and Department of Health Services (DHS) representatives were conducted throughout Phase I. Historical manufacturing records, DHS file documents, San Jose Hazardous Materials Unit reports and former employee interviews were completed by October 20th, 1987 and were subsequently used to formulate sampling, disposal, and health and safety plans. An aerial photograph of the site was taken so that a topographic site map could be prepared.

Task 2 - Preparation of a Health and Safety Plan

Mr. Michael Connor, an IT Certified Industrial Hygienist prepared a Health and Safety Plan specific to the Protomold site. The plan was reviewed by Mr. Al Wanger of the DHS on October 5th, 1987 in a meeting with Mr. Gabriel Dib and Mr. James Reid of IT Corporation. DHS requested changes were made to the plan and it was accepted (with addendum) on October 16th, 1987.

Task 3 - Prepare Quality Assurance/Quality Control Plan

An IT Corporation QA/QC plan, designed to assure work of the highest professional standards, was used for this project. All work on the Pannutti/Protomold project was done in compliance with corporate QA/QC guidelines.

Task 4 - Site Survey and Monitoring Location Selection

A topographic map has been constructed with drums, debris, and hazards identified. All drums were inventoried in place and identified according to location. No visible soil surface contamination was observed by IT DHS, therefore no soil sampling locations were proposed. Clean areas in front of the building were selected for a drum staging area and for a decontamination area.

Task 5 - Site Preparation/Field Monitoring/Sampling/Analysis

A. Site Preparation. Loose debris such as plaster moldings, bottles, tires, etc. were moved by backhoe to one area to provide room for safe working conditions. All stacked drums were lowered to the ground and each drum was labeled and numbered. Drums were moved to the staging area (front of the building) prior to sampling. Any damaged, fragile drums were overpacked into larger drums or the liquid was transferred to a new drum.

An old manufacturing laboratory contianing various chemicals was located within the main building. A complete chemical inventory was compiled.

B. Field Monitoring. The site was originally to be checked with a metal detector to locate underground pipes or subsurface drums. This plan was not implemented because: 1. the large quantity of metal debris and metal drums in the area would interfere with the detector and 2. after visual inspection there was no reason to believe that subsurface drums existed or that underground pipes would be effected.

Any noticeable stains on soil areas were to be checked with a Photo Ionization Detector. No visible stains were observed.

C. Sampling. At the staging area, drums were again inventoried and labels rechecked. All of the drums were opened and a brief description given for the contents of each drum. Selected discrete liquid and/or sludge samples were tested with a Hazardous Characterization (Hazcat) kit to provide compatibility results prior to laboratory analyses.

The discrete drum samples were hand delivered under chain of custody to the IT Vine Hill Laboratory in Martinez, CA. Using the Hazcat results as a guideline for compatability, the laboratory composited the discrete samples and subsequently performed predisposal analysis. Predisposal analyses were done on four (4) composite samples and one (1) discrete sample.

The four composites were obtained using the following criteria:

- Pure liquids with high hydrocarbon vapor pressures, indicating the potential of being flammable solvents, were composited to form Sample SA-E-1. Sample SA-E-1 was a composite of drums A-4, A-8, A-10, A-13, B-2, B-3, B-6, B-13, B-22, B-23 and D-1.
- Liquids with a low hydrocarbon vapor pressure were composited to form Sample SA-B-22. This sample was composed of discrete samples from drums A-3, A-6, A-7, B-16, B-20, B-24, B-25, B-29, E-1, E-3 and Composite E. Composite E was a field composite made of equal portions from drums E-2, E-4, E-5, E-6, and E-7.

- Semi-solid/sludge samples were composited to form sample SA-B-25. This sample was made up of discretes from drums A-11, B-1, B-8, B-9, B-10, B-12, B-14, B-15, B-17, B-18, B-19, B-32 and D-20.
- After opening and inspecting all 28 drums labeled sodium perborate tetrahydrate, three (3) drums deemed to be representative of of the 28 were field composited, and run as a separate sample. The field composite was taken from equal portions of drums C-4, D-9, and C-11. The laboratory designated this sample as SA-C4.

Drum B-21 was analyzed separately due to the fact that it was characterized as a fuming liquid. This sample is identified as SA-B21.

D. Analysis. All samples were analyzed in the laboratory for what IT terms "predisposal". This broad spectrum analysis is qualitative and quantitative and designed specifically to provide information allowing us to make judgements regarding proper transportation, storage and disposal of materials.

Task 6 - Documentation

Phase I was thoroughly documented and reviewed in preparation for Phase II.

PHASE II - DEVELOPMENT OF A CORRECTIVE ACTION PLAN

A comprehensive review of the Phase I - Environmental Investigation was undertaken to provide an effective plan for transportation, cleanup, and disposal of site materials. The implementation of this plan was contingent upon approval of the estate holders and the Department of Health Services (DHS).

Task 1 - Review, Plan Development, Meeting

IT reviewed Phase I activities and developed a corrective action plan. A meeting was held between key IT project staff and the estate representatives to: Review and discuss Phase I, review data and information, and discuss and assess the proposed corrective action plan. Subsequently the proposed corrective action plan was submitted for DHS approval.

Task 2 - Packaging and Disposal of Laboratory Chemicals

IT was to package the inventoried laboratory chemicals according to hazard categories, prepare a shipping list and stage the lab pack drums. Profile forms were to be sent to the appropriate disposal sites for approval prior to shipping. Estimated time for disposal sites approval was 4 to 5 weeks.

All chemicals except for those which are oxidizers or water reactives were to be transported by IT to disposal sites in California. The water reactives and oxidizers were to be transported to a site in Washington state.

Any reduction of the 107 item inventory, particularly the water reactives and oxidizers, would expedite the packaging. In this task no sampling was required and work was to begin within one week of plan approval.

Selling of the laboratory chemicals was proposed as an alternative to disposal. The DHS agreed to allow the chemicals to be sold.

Task 3 - Drum Removal and Disposal

IT proposed that this task be done in three parts as follows:

- Drums containing Phenols and PCBs were to be transported to an incineration unit.
- . Liquids were to be siphoned from the drums and taken to an appropriate facility.
- . Solids and drums were to be transported to a disposal site and buried.

Analytical results indicated levels of polychlorinated biphenyls (PCBs) and phenolics were present in a few of the drums. IT proposed that we pinpoint the drums which contain PCBs and/or phenolics, resample, and reanalyze them specifically for these contaminants. Analytical results were to be provided to the incineration site, drums transported and contents incinerated.

All remaining sludge/solids were to be stabilized, removed from the drums and loaded into a lined bin. The empty drums were to be crushed and placed in the bin. All of this material was to be taken to a disposal site and buried. Analyses were provided to the site so that no additional sampling was required.

During this time FAS personnel walked the site to determine if any visibly contaminated areas could be identified and sampled.

Task 4 - Documentation and Report Preparation

IT was to set up documentation of all aspects of Phase III including field sampling, analytical results, disposal sites and methods. A draft report was to be prepared for DHS review. The prime basis of the report was to detail the results of the corrective action plan on the Protomold property.

Task 5 - DHS Meeting/Site Walk

A meeting was held between key IT project staff, the client and DHS representatives to review the corrective action plan. The meeting was to provide the DHS with all proposed data needed to make determinations concerning the feasibility of the Phase II plan as it applied to "delisting" the site.

PHASE III - IMPLEMENTATION OF THE CORRECTIVE ACTION PLAN

As per agreement between IT Corporation and the DHS, the following action items were to be addressed for the corrective action plan and de-listing:

Task 1

Identification, analysis and disposal of chemical storage drums located on site.

Task 2

Identification of sites of possible soil contamination, soil analysis, and plans for soil remediation, if necessary.

Task 3

Identification and disposal of laboratory chemicals.

Task 4

Removal of various commercial products remaining from past on-site manufacturing processes.

Task 1 - Identification, Analysis and Drum Disposal:

A topographic map of the site was prepared and the drum areas segregated into five locations. The drums were labeled and removed to a staging area. The staging area was covered with visqueen to avoid ground contamination from leaks or spillage. At the staging area, drums were visually inspected, opened, and contents described. Samples were taken from each drum using a glass thieving rod. The samples were categorized and segregated according to physical inspection. "Haz-cat" testing was performed on disparate samples. "Haz-cat" results were used as a qualitative measurement of compatability for compositing samples. The drum samples were sent to the IT Vine Hill Laboratory, composited and run through a "predisposal" suite of analyses. The "predisposal" analyses were used to determine disposal sites. The drum disposal was seperated into three categories:

1. Incineration

Composite SA-E-1 liquids showed high levels of phenolic compounds. All drums used to make up the composite were resampled specifically for phenols and the drums which tested positive were marked for incineration. The oil containing drums from area E were sampled and analyzed for PCBs. Even though the initial predisposal sample from these drums showed 1.3 ppm PCBs, subsequent analysis specifically for PCBs was negative. Since the results were negative, it was decided that these drums would not need to go for incineration. All drums earmarked for incineration were profiled for disposal at Romic Chemical in East Palo Alto, California. These drums were placed in 85 gallon overpack drums and were removed on July 20, 1988.

2. Liquid

All liquids not containing phenolics were siphoned into a vacuum truck and sent to Gibson Oil in Bakersfield, California for disposal on March 24, 1988.

3. Solids

All solids were emptied from the drums and placed in a lined bin. The drums were washed out (liquid from washout was included in the Gibson Oil disposal), crushed and placed in the bin. This waste was profiled for disposal at the Casmalia, California hazardous waste disposal site. The bin was sealed and taken for disposal on July 22. 1988.

Task - 2 Identification of Sites of Possible Soil Contamination, Analysis, Remediation

After discussions with the DHS, it was decided that soil samples would be taken in areas where drums containing PCBs and phenolics were found. Initially Area E was indicated for PCB testing and Area B for phenols. At the suggestion of the DHS, surficial samples were taken in Area E in spots where visual oil spillage had occured. Four surface scrapes were taken, composited in the field and analyzed for PCBs. Area B was sampled in two locations at a depth of 4' to 4'6" using a stainless steel auger. The samples were field composited and tested for phenols. Upon review of the liquid phenol analysis, it was determined that soil samples should also be taken in Areas C and D. Four surface scrapes were taken at each area and field composited. These areas were then tested for phenols. All soil sample results were negative, therefore no soil remediation is deemed necessary.

Task 3 - Identification and Disposal of Laboratory Chemicals

A lab inventory was taken. With DHS approval, the estate was given permission to sell the lab contents. The contents were sold to a Mr. Ed Mesiti and removed on March 15, 1988.

Task 4 - Removal of Commercial Products:

The Pannutti's have removed all products of the past manufacturing processes. These items included boxes of soaps, toilet cleaners, deodorizers, etc.

Enclosed for your review are the following support documents:

- . Health and Safety Plan
- . Site Map
- . Drum Content Description
- . Drum Sample Hazardous Characterization Results
- Master Sample Log
- Analytical Results
- . Laboratory Inventory
- . Copies of the Hazardous Waste Manifests

HEALTH AND SAFETY PLAN

IT CORPORATION

PANNUTTI/PROTOMOLD

SITE SAMPLING

HEALTH AND SAFETY PLAN

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1.0 HEALTH AND SAFETY

1.1 INTRODUCTION

It is the policy of IT Corporation (ITC) to provide a safe and healthful work environment for all its employees. IT considers no phase of operations or administration to be of greater importance than injury and illness prevention. Safety takes precedence over expediency or short cuts and every attempt will be made to reduce the possibility of injury, illness, or accident occurrence.

The purpose of the safety program is to assign IT site personnel health and safety responsibilities, prescribe mandatory operating procedures, establish personal protective equipment requirements for job or work or activity, for alternative and contingency work items, for emergency response and for spill clean-up and abatement in order to successfully and safely perform the sampling at the Pannutti/Protomold site in San Jose, California.

The provisions of this plan are mandatory for all IT personnel assigned to the project. All authorized visitors to the site will be required to abide by these procedures. Work conditions can be expected to change as the operation progresses. 'As appropriate, addenda to the plan will be provided by the Health and Safety (H&S) Division representative. No changes to the plan will be implemented without prior approval of the H&S Division.

1.2 ASSIGNMENT OF RESPONSIBILITIES

1.2.1 Project Manager

The Project Manager will be responsible for field implementation of the Health and Safety Plan. This will include communicating site requirements to all personnel, field supervision, and consultation with the H&S representative regarding appropriate changes to the Health and Safety Plan. The Project Manager will be Jim Reid.

1.2.2 Health and Safety Representative

A project H&S representative, Mr. Michael Connor, CIH, will be responsible for the development and coordination of the site Health and Safety Plan. This Plan will comply with established site specific procedures in all respects and will include medical surveillance, training requirements, hazard assessment, personal protective equipment, field implementation, and audits. Agency liaison on matters relating to safety and health will be handled by H&S Division representatives.

1.2.3 Technicians/Subcontractors

Technicians, subcontractors, and other personnel on-site will be responsible for understanding and complying with all site requirements.

1.3 MEDICAL PROGRAM

All ITC personnel on-site shall have successfully completed a preplacement or periodic/update physical examination. This examination has been designed to comply with appropriate regulatory requirements for hazardous waste site operations.

The IT Corporation medical program as outlined in ITC Policy and Procedures 9010.1B and 9410.2A, consists of:

Medical and Occupational History Form (detailed questionnaire for new employees, short questionnaire for periodic exams).

Physical Examinations.

Blood Analysis,

Urinalysis,

Chest X-ray.

Pulmonary Function Test,

Audiogram.

Electrocardiogram (if indicated during exam)

1.4 EMERGENCY MEDICAL TREATMENT

The following procedures have been established to provide appropriate assistance should there be an occupational illness or injury on site:

- 1. There will be at least one individual currently certified in Cardiopulmonary Resuscitation and First Aid on-site. A first aid kit will be available on site.
- 2. A local nearby hospital shall be identified prior to job starting up. Its location shall be shown on a route map, which is to be attached to the tailgate safety meeting form. This form shall also show the ambulance or paramedic telephone and emergency numbers. The location of the nearest telephone to the job site shall be identified during the tailgate safety meeting.
- 3. In the event of illness or injury, the following steps will be taken:
 - a. Administer first aid or CPR only if trained.
 - b. Notify project management.
 - c. Notify Health and Safety.
 - d. Transport injured if possible. Do not transport if fractures are involved. Call ambulance if necessary.
 - e. Complete the Supervisors Employee Injury Report within 24 hours.

1.5 TRAINING

All ITC project personnel shall have completed the corporate Hazards and Protection course. This course covers chemical hazards, hazard recognition, hazard assessment, personal protective equipment and proper handling techniques for hazardous materials.

1.6 HAZARD EVALUATION AND SAFETY CONSIDERATIONS

The site work, such as drum sampling, can potentially expose site personnel to chemical and physical hazards. These hazards may include toxic airborne contaminants, slips, trips, falls and heat stress. These hazards will be reduced through the use of personal protective equipment and safe work practices, as set forth in this plan.

The relative toxicological risks associated with this project are limited based on the nature of past operations and based on the nature of the project. The sampling of each drum will represent a limited time of exposure and thus limit the toxicological risk to potentially toxic substances. Past operations involved the use of caustic liquids, fatty acid salts, and low toxicity solvents such as acetone. For these reasons, EPA Level C protection will provide adequate protection.

1.7 GENERAL SITE SAFETY REQUIREMENTS

- 1. Prior to starting work the sampling area shall be delineated into two zones, as follows:
 - Zone of possible contamination This zone includes all areas of potentially contaminated soil and an area 5 feet beyond the perimeter of such potentially contaminated soil.
 - Clean Zone This zone covers all areas outside of the zone of potential contamination. Adverse exposure to chemicals is unlikely.

The delineation of these zones shall be sketched in the field log book.

2. A decontamination station shall be established at the border of the zone of potential contamination reduction. All personnel entering or leaving the sampling site shall pass through this station to don or doff the appropriate protective equipment. Used protective clothing shall be bagged in this area.

- 3. A tailgate safety meeting shall be conducted at the beginning of each shift and whenever new personnel arrive, or when a unique work assignment warrants employee indoctrination and training. Tailgate safety meetings are to be conducted by the supervisor, a safety representative, or other qualified persons.
- 4. The field supervisor shall take positive steps to ensure that employees are protected from physical hazards, which would include, but are not limited to, the following:
 - Insufficient or faulty personal protective equipment
 - Insufficient or faulty operations equipment and tools
 - Noise in excess of acceptable levels
 - Tripping over hoses, pipes, tools, or equipment
 - Slipping on wet or oily surfaces
 - Appropriate action to provide secure footing shall be taken at all locations where personnel will be working.
- 5. Legible and understandable precautionary labels shall be prominently affixed to containers of raw materials, intermediates, products, by-products, mixtures, scrap, waste, debris, and contaminated clothing.
- 6. Eating, drinking and smoking shall be restricted to areas within the clean zone.
- 7. Bulging drums shall be opened with a remote drum opening unit powered by compressed air. All personnel shall stand upwind of the work area when opening bulging drums.
- 8. Field personnel must observe themselves and each other for signs of toxic exposure. Indications of adverse effects include, but are not limited to:
 - Changes in complexion and skin color
 - Changes in coordination

- · Changes in demeanor
- · Excessive salivation
- Abnormal pupillary response
- · Changes in speech pattern.
- 9. Field personnel shall be instructed to inform their supervisor of any non-visual effects of toxic exposure such as:
 - Headaches
 - Dizziness
 - Nausea
 - Blurred vision
 - Cramps
 - Irritation of eyes, skin, or respiratory tract
 - Any other abnormal physiological functions.
- 10. Appropriate drum handling procedures such as the use of forklifts shall be used to minimize the physical hazards associated with such activities.
- 11. A portable emergency eyewash shower shall be attainable on site. It shall be kept in a shaded area, less than 100 feet from the work area, to avoid heating its contents significantly.

1.8 PROTECTIVE EQUIPMENT REQUIREMENTS

1. Personal protective equipment requirements will be established via task assignment and location. Two zones will be established on-site with requirements tailored to the specific needs of each zone.

Clean Zone: No special protective equipment is required for work in this area.

Zone of Potential Contamination: The following will be the minimum requirement for work within this zone:

Hard hat,
Safety glasses,
White tyvek coveralls,
PVC boots with steel toe,
Nitrile gloves,
Scott 64 half-face air purifying respirator with 624 OVH cartridges (organic vapor/H.E.P.A.)

2. Respiratory Protection

All respirators shall be utilized and maintained in accordance with established procedures. These procedures include written operating instructions governing the selection, instruction and training, cleaning and sanitizing, inspection and maintenance of these respirators. Taken together, these procedures comply with 29 CFR Section 1910.134.

Properly cleaned, maintained, NIOSH approved respirators shall be used.

IT Health and Safety Division has reviewed the selection of respirators for the project, in accordance with ITC's respiratory protection policy.

As a minimum, air purifying cartridges shall be replaced at the end of each day.

Employees wearing air-purifying respirators shall be required to change filter elements whenever an increase in breathing resistance or break-through is detected.

1.9 Decontamination

No personal protective equipment shall be worn out of the contaminated area. Employees leaving the contaminated area shall remove protective clothing at the area required by Section 1.7.2 of this plan.

Visibly contaminated clothing shall be placed in plastic bags which shall

be appropriately labelled. Visibly clean protective clothing may be reused on the same day. Contaminated equipment shall be washed with soap and water prior to removal.

Employees shall wash hands and face prior to eating, drinking and smoking. The field supervisor shall ensure there are adequate facilities available for this purpose.

1.10 HEAT STRESS

The use of impermeable personal protective equipment in warm environment may lead to heat stress which will result in physical discomfort, reduced efficiency and increased accident probability. Although white tyvek is the type of protective clothing least likely to lead to heat stress, the following measures shall be taken to minimize heat stress:

- a) An adequate supply of drinking water will be available for use. Employees shall be encouraged to drink more than the amount required to satisfy thirst, as thirst satisfaction is not an accurate indicator of adequate salt and fluid replacement.
- b) Employees shall be instructed to monitor themselves for such symptoms of heat stress as headaches, dizziness, nausea, cramps, and fatigue. Where these become obvious, breaks shall be taken in a cool shaded area. Protective clothing shall be removed and no other tasks will be assigned during these rest periods. The cooling off breaks shall last a minimum of 10 minutes.
- c) Employees shall be encouraged to follow a balanced diet and to obtain adequate rest as a means to prevent heat stress. The delirious effects of alcohol consumption with regards to heat stress prevention shall be reviewed with employees.

DEPARTMENT OF HEALTH SERVICES 2151 BERKELEY WAY BERKELEY, CA 94704



October 6, 1987

CERTIFIED MAIL

Mr. Jim Reid IT Corporation 4585 Pacheco Boulevard Martinez, CA 94553

Dear Mr. Reid:

Following our meeting on Monday, October 5, 1987, I reviewed IT's draft Health and Safety plan with our regional Industrial Hygienist. He felt that the plan was generally acceptable, although he had several comments and suggestions for improvement. These are as follows:

- * Phone numbers should be included in the plan for the Project Manager, Site Safety Officer (if different than the Project Manager), Health and Safety representative and other appropriate contact persons. Also, all emergency phone numbers should be included in the plan.
- * The location of the nearest telephone should be included in the plan. Additionally, a map showing the route to the nearest hospital or emergency medical facility should also be included.
- * Chemical goggles should be worn if workers are using a half-face air purifying respirator rather than safety glasses.
- * Coated tyvek (PE tyvek or Saranex) should be worn by workers actually sampling drums. Plain tyvek provides insufficient protection for splash hazards, especially when working with caustic materials.
- * EPA guidelines for monitoring Heat Stress should be followed. (See attachment 1)
- * Plan should state what action will be taken if direct measurement shows the concentration of vapors are high during drum sampling activity. Will the level of protection be changed (SCBA) or will workers leave the area?

* A windsock or some other device should be used so workers can easily ascertain wind direction.

I have also included draft DHS guidelines for the development of site safety plans for your information. If you have any questions, feel free to contact me at (415) 540-2090.

Sincerely,

Al Wanger

Hazardous Materials Specialist

Site Mitigation Unit

al Wangn

North Coast California Section Toxic Substances Control Division

Cert. #P 692 236 560

Enclosures



October 20, 1987

Mr. Al Wanger
Hazardous Materials Specialist
Site Mitigation Unit
North Coast California Section
Toxic Substances Control Division
Department of Health Services
2151 Berkeley Way
Berkeley, CA 94704

480017.01.01

Dear Mr. Wanger:

The purpose of this letter is to address your comments on IT's Health and Safety Plan for the Pannutti/Protomold project in San Jose. You recently sent these comments to Mr. Jim Reid, IT's Project Manager, on October 6, 1987. The order of these responses corresponds to that of your comments.

- Mr. Reid will be on site during field activities. Should he be absent, he may be contacted at (415) 372-9100, extension 3182. As the project Health and Safety Coordinator, I will be available at (415) 372-9100, extension 3136. Emergency telephone numbers shall be included in the Tailgate Safety Meeting Form, which shall be completed daily. Each employee on site is required to sign the form.
- The Project Manager, Mr. Reid, shall identify the location of the nearest telephone to the crew at the beginning of the project. Mr. Reid is also responsible for providing a route map to the nearest emergency medical facility, which shall be identified at the beginning of each day.
- Since sampling drums represents a low potential for splashes, face shields shall be worn in addition to safety glasses.
- Polyethylene coated Tyvek shall be required when sampling drums.
- Heat stress is not anticipated to be a problem. Mr.
 Reid is fully aware of the potential for heat stress
 when protective clothing is worn. He will remind site
 employees of this potential and will instruct them to

monitor themselves and each other for heat stress. IT's employees have been instructed in the signs and symptoms of heat stress.

Additionally, Gatorade will be available as will a shaded area for rest. Break periods shall last 10 minutes.

- In the unlikely event of high levels (i.e., more than 10 ppm) in the breathing zone, employees shall evacuate the immediate work area. It should be noted that although headspace levels in the drum may be high, breathing zone levels will be much lower, since the drum opening is a point source. Further, sampling employees will be wearing respiratory protection.
- Since Mr. Reid will be supervising on site during field activities, he shall determine wind direction, and inform employees, as necessary.

As stated in the Health and Safety Plan, this project represents a relatively low toxicological hazard to employees conducting the proposed activities. Therefore, the measures indicated in the Health and Safety Plan, and as shown above, will provide more than adequate protection.

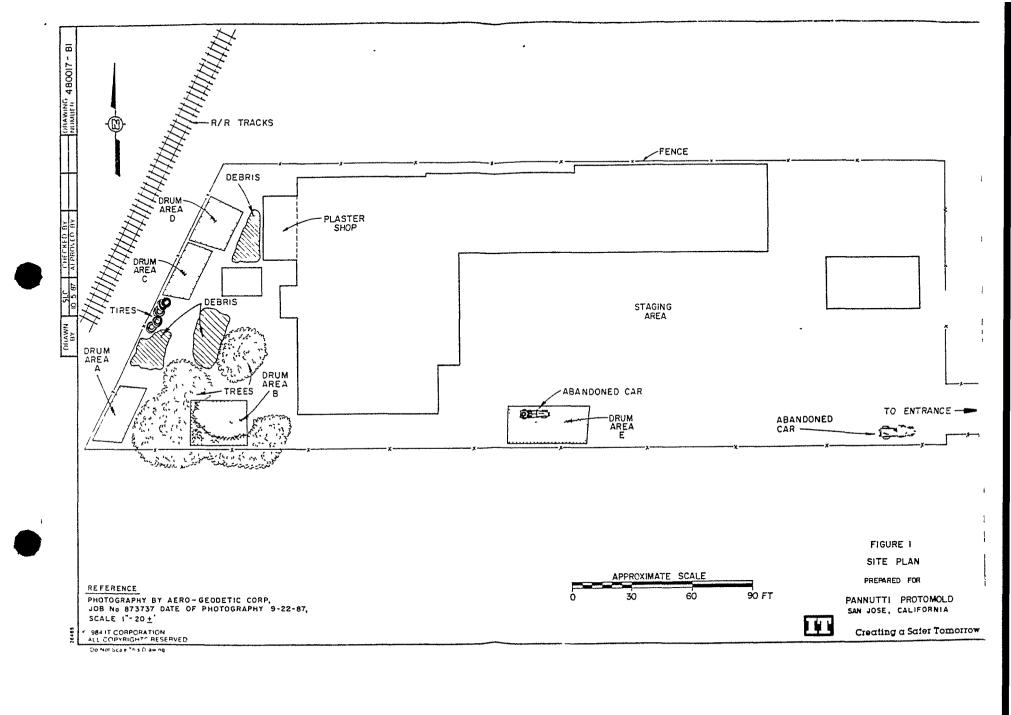
If you have any questions regarding the health and safety of this project, please feel free to call me.

Sincerely,

Michael Connec

Michael Connor, CIH Industrial Hygienist

MC: PRO/L101B FAS:3065 SITE MAP



DRUM CONTENT DESCRIPTION

PANNUTTI/PROTOMOLD PRELIMINARY DRUM SAMPLING DESCRIPTION

October 28, 1987

Project No: 480017.01.05.02

Drum No.	Description	Time	Comments
A-1	Solid .	1155	Less than 10% of drum contains product
A-2	Empty ·	1154	
A-3	Dark blue viscous liquid	1157	Drum leaks, old drum overpacked into 85 gallon drum, full drum
A-4	Red-brown liquid/sludge	1158	~ 1/2 full drum
A-5	Solid	1217	2" in bottom of drum
A-6	Red-brown liquid/sludge	1215	1" in bottom of drum
A-7	Red-brown oily liquid	1213	~ 1/2 full drum
A-8	Red-brown liquid/sludge	1211	Full drum
A-9	Solid	1209	~ 3/4 full drum
A-10	Dark brown viscous liquid	1206	Full drum
A-11 `	Red-brown liquid/sludge	1203	~ 3/4 full drum
A-12	Empty	1205 .	
A-13	Light beige liquid	1201	~ 1/2 full drum
B - 1	Gray liquid	1423	Full drum
B-2	Clear brown liquid	1107	Full drum
B-3	Gray-brown liquid	1109	Full drum
8-4	Empty	1110	
B-5	Empty	1111	7
B-6	Amber liquid	1112	Full drum
B-7	Solid	1114	1" in bottom of drum
	·		

Drum No.	Description	Time	Comments
B-8	Clear liquid	1426	Full drum, phenolic odor
B-9 .	Cloudy white liquid	1104	Full drum, drum labeled Fatty Acid Products
B-10	Clear green liquid	1120	Full drum
B-11	Solid	1138	Full drum
B-12	Light brown liquid	1102	~ 1/5 full, leaky drum - liquid pumped into new 55 gallon drum
B-13	Clear liquid/suspended solids	1429	~ 3/4 full drum, uncharacterizable odor
B-14	Beige liquid	1125	Full drum, replaced bung
B-15	Clear green liquid	1143	Full drum
B-16	Bilayer - Oily brown liquid/Clear liquid	1100	Full drum
B-17 ,	Clear green liquid	11,48	Full drum
B-18	Clear green liquid	1057	~ 3/4 full drum
B-19	White liquid	1152	Full drum
B-20	Semi-solid, rust colored	1054	Full drum
B-21	Brown fuming liquid	1051	~ 3/4 full drum
B-22	Brown liquid	1029	Full drum
B-23	Semi-clear liquid	1231	Full drum, leaking at top, over-packed into 85 gallon drum
B-24	Semi-solid, oily	1045	Full drum
B-25	Light brown, viscous liquid	1225	7 3/4 full drum, leaking at the side, overpacked into 85 gallon drum

Drum No.	Description .	Time	Comments
B-26	Empty	1139	
B-27	Empty	1140	
B-28	Empty .	1141	•
B-29	Dark brown liquid	1145	Full drum
B-30	Empty		•
B-31	Debris, resin	1159	~ 1/2 full drum
B-32	Clear brown liquid	1420	~ 1/2 full drum, leaking, pumped into new 55 gallon drum
C-1	Empty	1235	
C-2	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1305	Full drum
C-3	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1306	Full drum
C-4	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1307	Full drum
C-5	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1308	Full drum
C-6	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1309	Full drum
C-7	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1310	Full drum

Drum No.	Description	Time	Comments
C-8	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1311	Full drum
C-9	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1312	Full drum .
C-10	Empty	1313	
C-11	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1314	Full drum
C-12	Empty	1315	-
C-13	Empty	1316	
C-14	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1317	Full drum
C-15	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1318	Full drum
C-16	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1319	Full drum
D-1	Brown liquid, suspended solids	1321	~ 1/2 full drum, leaking, pumped into new 55 gallon drum
D-2	Empty	1322	
D-3	Empty	1323	
0-4	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1324	Full drum

Drum No.	Description	Time	Comments
D-5	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1325	Full drum
D-6	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1326	Full drum
D-7	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1327	Full drum
D-8	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1328	Full drum
D-9	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1329	Full drum
D-10	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1330	Full drum
D-11 `	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1331	Full drum
D-12	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1332	Full drum
D-13	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1333	Full drum
D-14	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1334	Full drum
D-15	Empty	1335	
D-16	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1336	Full drum

Drum No.	Description	Time	Comments
D-17	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1337	Full drum
D-18	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1338	Full drum .
D-19	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1339	Full drum
D-20	Brown liquid	1359	Full drum
D-21	Labeled Sodium Perborate Tetrahydrate. Solid, soap like, beige colored	1340	Full drum
E-1	Oil/liquid (water)	1345	~ 3/4 full drum
E-2	Oil/liquid (water)	1346	~ 3/4 full drum
E-3	Oil/liquid (water)	1347	~ 3/4 full drum
E-4	Oil/liquid (water)	1349	~ 3/4 full drum
E-5	Oil/liquid (water)	1351	~ 3/4 full drum
E-6	Oil/liquid (water)	1355	~ 3/4 full drum
E-7	Waste Oil/debris	1402	~ 3/4 full drum

DRUM SAMPLE HAZARDOUS CHARACTERIZATION RESULTS

LABORATORY INVENTORY

PANNUTTI/PROTOMOLD

LABORATORY INVENTORY 10/27/87

PROJECT NO. 480017.01.05.02

LAB INVENTORY PANNUTTI/PROTO MOLD 10/27/87 PROJ. NO. 480017.01.05.02

CONTAINER # SIZE AMT. IN CONTAINER CONTENTS

LIQUIDS:				
	1 .	1 Gal	1 Pt	28% AMMONIA
		1 Ga1	ī Pt	FRESHENER BASE
	2 3 4 5 6	1 Gal	3 Pts	25% AMMONIA
·	4	1 Pt	1 Pt	AUTO POLISH
	5	16 oz	8 oz	88% NaOH .
	6	1 Gal	1/2 Gal	SPHAGHNUM SOL'N
	7	16 oz	25 ml	PINE OIL
	8	16 oz	150 ml	GLYCERINE
	9	16 oz	10 ml	PINE OIL
	10	16 oz	500 ml	OLEIC ACID
	11	16 oz	10 ml	NACCANOL SL 60
	12	16 oz	25 ml	NACCANOL SL 60
	13	16 oz	14 oz	CO 450
	14	16 oz	8 oz	BUTYL ACETATE
	15	16 oz	7 oz	ISOPROPANOL 99%
	16	16 oz	3 oz	ISOPROPANOL/NAPHTHALENE
	17	16 oz	6 oz	BENZALDAHYDE (CRYSTAL)
	18	32 oz	4 oz	THINNER (KETONE/
				PETRO DISTILLATE)
	19	16 oz	3 oz	NAPHTHALENE/MINERAL
				SPIRITS
	20	16 oz	2 oz	COLLOSIZE WSLM
•	21	16 oz	<1 oz	POLYOXYTHYLENE NONYPHENOL
;	t			NIW
	22	16 oz	2 oz	BORIC ACID SOL'N
	23	16 oz	6 oz	BORAX SOL'N 5%
	24	16 oz	<1 oz	CO-530/SANTOPHEN
	25	16 oz	2 oz	CRYSTAMET
	26	16 oz	9 oz	ETHYLENE GLYCOL/BORAX SOL'N
	27	16 oz	8 oz	PERMA-KLEER G 42
	28	16 oz	14 oz	IGEPAL CO-990 50%
	29	16 oz	8 oz	SANTOPHEN/NI-W 10% SOL'N
	30	16 oz	7 oz	CO 430
•	31	16 oz	12 oz	HEMISODIUM PHOSPHATE 5%
	32	1/2 Gal	10 oz	BUTYL CELLOSOLVE
	33	1 Gal	1/2 Gal	CELLOSIZE
	34	1 Gal	3/4 Gal	HYPO SOL'N 2-3 gm Ag/1

	35	- 1/2 Gal	1/2 Gal	BROOKS FILM FIXER
	36	1/2 Gal	1/2 Gal	BROOKS FORMULA 76 FILM
		•	•	DEVELOPER
•	37	24 oz	24 oz	TY-D-BOL
	38	16 oz	16 oz	TY-D-BOL
	39	24 oz	24 oz	TY-D-BOL
	40	16 oz	12 oz	TY-D-BOL
	41	24° oz	12 oz	TY-D-BOL
	42	16 oz	8 oz	TY-D-BOL
	43	1 1b	aerosol cans	MOLD RELEASE
	44	1 16	aerosol cans	MOLD RELEASE
	45 .	1 1b	aerosol cans	MOLD RELEASE
	46 47	16 oz	16 oz	UNKNOWN
	47	16 oz	8 oz	UNKNOWN
	48 49	' 1/2 Gal 32 oz	1 1/2 qt 16 oz	UNKNOWN
	50	1 Gal	3/4 Gal	UNKNOWN UNKNOWN
SOLIDS:	51	500 m1	20 gm	KOH
302103.	52	1/2 Ga1	2/3 Gal	TETRASODIUM EDTA
	53	Plastic Bag	1 1b	MIC 201
	54	1/2 Gal	2/3 Gal	TETRASODIUM PYROPHOSPHATE
	55	1/2 Gal	1/6 Ga1	BORIC ACID
	56	1/2 Gal	1/8 Gal	BORAX POWDER - 10 H20
	57	1/2 Gal	1/8 Gal	IGEPAL - CO - 990 2
	58	1/2 Gal	1/8 Gal	OG - POWDER PHASE
	59	1/2 Gal	1/6 Gal	BORAX - ANHYDROUS
	60	1/2 Gal	1/4 Gal	MONOSODIUM PHOSPHATE
	61	1/2 Gal	1/4 Gal	BORAX - GRANULAR
	62	1/2 Gal	1/8 Gal	VITROKLEEN #33
	63	1/2 Gal	1/6 Gal	VITROKLEEN #20
	64	5 lb	2 lb	ALUMINUM AMMONIUM SULFATE
	65 66	16 oz	5 oz	SPRAY & CLEAN #4
•	66 67	100 g 1 Gal	100 gm 1/2 Gal	1,8 NAPHTHALIC ANHYDRIDE OXYTRICARB ACID
	68	1 Gal	1/2 Gal	OXALIC ACID - 2 H ₂ O
	69	1/2 Gal	1/8 Gal	SLUG POWDER #7
	70	1 15	1 1b ·	POTASSIUM HYDROXIDE
	71	1 1b	1 1b	POTASSIUM HYDROXIDE
	72	1 lb	1 75	ALUMINUM CHLORIDE
	73	1 lb	1 lb	ALUMINUM CHLORIDE
	74	1 1b	1 1b	ALUMINUM CHLORIDE
	75	1 16	1 16	ALUMINUM CHLORIDE
	76	1 1b	1 1b	ALUMINUM CHLORIDE
	77	1/2 Gal	1/4 Gal	SPRAY & CLEAN #31
	78 70	1/2 Gal	1/10 Gal	NAPHTHALENE 100% PETERSON'S FORMULA #11
	79 80	50 gm Cardboard box	20 gm	SOLID TOILET BOWL CLEANER
MISC.	81	8 oz	4 oz	BO-720 EMULPHOGENE
11120.	01	3 02	,	rae milestivesive

82	8 oz	3 oz	BO-840 EMULPHOGENE HAPPY JON SM CONC. #12 NACCONOL 60S/FGND C0530 & SILICONE RUBA DUB DUB DOWACIDE COT 2% PROPYLENE GLYCOL PROPYLENE GLYCOL/ MONOBUTYL ETHER
83	8 oz	8 oz	
84	8 oz	3 oz	
85	1/2 Gal	2 oz	
86	16 oz	3 oz	
87	500 ml	150 m1	
88	16 oz	<1 oz	
89	16 oz	6 oz	
90	16 oz	4 oz	
91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107	16 oz 16 oz	8 oz 16 oz 8 oz 3 oz <1 oz 3 oz 9 oz <1 oz 7 oz 1 oz 3 oz 1 oz 1 oz 1 oz 1 oz	Mg Si P6 CHLOROSTOP NaC1 SOL'N YELLOW D&C (URANINE) 2% HYDROWET CELLOSIZE COCO BASE SOAP 2% SANTOMERSE #1 CNC SOL'N VARNISH/PAINT REMOVER DISTILLED H20 PINE OIL REFINED NAPHTHALENE CONC. GLASS CLEANER CARBITOL AQUAWET - METHYL SAL/ISOPROPYL/NIW TWA? 20

MASTER SAMPLE LOG

PANNUTTI/PROTOMOLD HAZARD CHARACTERIZATION RESULTS 10/28/87 PROJECT NO. 480017.05.02

	FLAMMABILITY GX-3A&LEL	COMBUSTABILITY	CHLORINATED	SPECIFIC GRAVITY	WATER REACTIVITY	WATER SOLUBILITY	рН, S.U.	OXIDENT	CYANIDES	SJLFIDES	COMMENTS
um B-18	01	Negative	Negativ e	Lighter than water	Negative	Total	14	Negative	Negative	Negative	Single layer, green liquid, no sludge, no solids.
_m B-3	5%	Negative	Negative	Lighter than water	Negative	Total	7	Negative	Negative	Negative	Bilayer, light gray liquid over brown liquid.
um B-25	0\$	Positive	Negative	Lighter than water	Negative	Insoluble	7	Negative	Negative	Negative	Amber gel, vasoline like
um B-12	01	Negativ e	Negative	Lighter than water	Negative	Total	12	Negative	Negative	Negative	Single layer/brown liquid
Jm B−6	20%	Positive	Negative	Equal to water	Negative	Total	9	Negative	Negative	Negative	Single layer/brown liqu d
um B-2	0\$	Positive	Negative	Heavier than water	Negative	Total	3-4	Negative	Negat∶ve	Negative	Single layer, ght orange liquid.
un A-3	0 \$	Negative	Negative	Lighter than water	Negative	Total	Unknown	Negative	Ur known	Negative	Bi-layer, dark blue over light blue liquid
m A-7	0\$	Negative	Negative	Lighter than water-Top layer Equal to water-Bottom layer		Partial	7	Negative	Negative	Negative	Bi-layer, brown oil over smokey liquid.
8-2	401	Positive	Negative	Split-some heavier some lighter than water	Negative	Isoluble	5	Negative	Negative	Negative	Single layer, redd sh liquid with suspended solids
* COTFUS	i+e 0%	Negative	Negative	Lighter than water	Negative	"o+a!	9	Negātive	Negative	Negative	Single layer solic, creamy colored.
6	5 £	Negative	Nega+:ve	Lighter than water	Negative	Total	7	Nega+ive	Negative	Negative	Single layer/brown sludge
r 4	100%	Positive	Negative	Heavier than water	Negative	insoluble	6	Negative	Negative	Negative	Single layer/reddish sludge.

Jrum D−20	0\$	Negative	Negative	Lighter than water	Negative	Total	7	Negative	Negative	Negative	Bi-layer, light brown over dark brown liquid.
rum B−14	01	Negative	Negative	Equal to water	Negative	Total	7	Negative	Negative	Negative	Single layer, egg shell colore liquid.
∪mposite E	0\$	Positive	Negative	Heavier than water	Negative	Insoluble	6	Negative	Negative	Negative	Bi-layer, dark oil over stained clear liquid.
rum B-1	0\$	Negative	Negative	Lighter than water	Negative	Partial	7	Negative	Negative	Negative	Single layer/grey liquid.
rum B-13	40%	Positive	Negative	Lighter than water	Negative	Total	7	Negative	Negative	Negative	Single layer, light amber liquid.
rum B-29	01	Positive	Negative	Heavier than water	Negative	Insoluble	4	Negativ e	Negative	Negative	Bi-layer, brown over light amber liquid.
rum B-20	05	Positive .	Negative	Heavier than water	Negative	insoluble	4	Negative	Negative	Negative	Bi-layer, dark brown over light brown liquid.
um B-23	5%	Negative	Negative	Equal to water	Negative	Total	7	Negative	Negative	Negative	Single layer/cloudy liquid.
um B-16	0\$	Positive	Negative	Heavier than water	Negative	Partial	7	Negative	Negative	Negative	Bi-layer,amber over light amber liquid.
//-A mc	OI	Negative	Negative	Lighter than water	Negative	Total	7	Negative	Negative	Negative	Single layer, recoish brown liquid.
um B-9	0\$	Negative	Negative	Lighter than water	Negative	Total	14	Negative	Negative	Neĝative	Single layer, cloudy

liquid.

and pH on this sample could not be determined, due like Substance made pH paper unreadable. It composite of drums C-4, D-9, C-11 all labeled sodium perborate tetrahydride.

ENCLOSURE 1
MASTER SAMPLE LOG

MASTER SAMPLE LOG PANNUTTI/PROTOMOLD ITC PROJECT NO. 480017

SAMPLE ID NO.	LOCATION	DESCRIPTION	ANALYTICAL PARAMETERS	<u>RESULTS</u>
SA-E-1 .	Drums	Liquid/Sludge Lab Composite of Drums A-4, A-8, A-10, A-13, B-2, B-3, B-13, B-22, B-23, D-1	Predisposal Analysis	See page 1 of enclosure 2
SA-B-22	Drums	Liquid/Sludge Lab Composite of Drums A-3, A-6, A-7, B-16, B-20, B-24, B-25, B-29, E-1, E-3, and Composite E (Field Composite of E-2, E-4, E-5, E-6, E-7)	Predisposal Analysis	See page 2 of enclosure 2
SA-B-25	Drums	Semi-Solid Lab Composite of Drums A-11, B-1, B-8, B-9, B-10, B-12, B-14, B-15, B-17, B-18, B-19, B-32, D-20	Predisposal Analysis	See page 3 of enclosure 2
SA-C-4	Drums	Solid Field Composite of Drums C-4, C-11, D-9 Labeled Sodium Perborate Tetrahydrate. Representative of 28 Drums.	Predisposal Analysis	See page 4 of enclosure 2
SA-B-21	Drums	Fuming Liquid	Predisposal Analysis	See page 5 of enclosure 2
03101225	Drum E-3	Oi1/Sludge	Polychlorinated Biphenyls	See page 6 of enclosure 2
03101230	Drum E−1	Oil/Sludge, Field Composite of E-1, E-2, E-4, E-5, E-6, E-7	Polychlorinated Biphenyls	See page 6 of enclosure 2

SAMPLE ID NO.	LOCATION	DESCRIPTION	ANALYTICAL PARAMETERS	RESULTS
03110255	Area E	Discolored Surface Soil, 4 to 1 Field Composite	Polychlorinated Biphynyls	See page 6 of enclosure 2
03101330	Area B	Soil 4' to 4'6" Depth, 2 to 1 Field Composite	Phenols	See page 6 of enclosure 2
03151135	Drum B-2	Liquid/Sludge ~	Pheno1s	See page 7 of enclosure 2
03151215	Drum B-23	Liquid/Sludge	Pheno1s	See page 7 of enclosure 2
03151220	Drum D-1	Liquid/Sludge	Pheno1s	See page 7 of enclosure 2
03151155	Drum A-8	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151205	Drum B-3	Liquid/Sludge	Pheno1s	See page 7 of enclosure 2
03151235	Drum B-22	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151145	Drum A-4	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151230	Drum A-10	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151200	Drum B-6	Liquid/Sludge `	Phenols	See page 7 of enclosure 2
P04061100	Area A	Surface Soil 4 to 1 Field Composite	Pheno1s	See page 8 of enclosure 2
P04061110	Area B	Surface Soil 4 to 1 Field Composite	Pheno1s	See page 8 of enclosure 2

ENCLOSURE 2 ANALYTICAL RESULTS

ANALYTICAL RESULTS

sulson by - atter-line

IT CORPORATION ANALYTICAL REPORT

WORL OFDER # M7-12-023 JOB # 89960 SAMPLE # 01 OF 1

Generator name: Waste description: Generatino Frocess: Volume / frequency:

IT-FAS MARTINEZ SA-E-1 LIQUIDS PANNUTTI/PROTO MOLD

TEST	RESULT	UNITS	RESULTS PY (GC ANALYSI	3	
HCVF	2200	pom	TEST	RESULT	UNITS	
DENSITY	950	G/L	FORMALDEHYDE	NA	ppm	
FH	7.0	рH	FCB	ND 1.0	mg/l.g	
NORMALITY	₹0.1	N	FHENOL	* J400	mç∕l	
SON	Ö	7.	CRESOL	NA	DDW	
CN	ND @ 5	ppm	HALOGENATED	★ 940	mǥ/l	
SULFIDE	*ND @ T	maa				
FORMALDEHYDE	200	ppm	RESULTS BY	IC ANALYSI	<u>s</u>	
AMMONIA	<200	bbw	CN	NA	 pom	
FLUORIDE	NA	maa	SULFIDE	NF	\square \square \square	
YS OXIDANT	ND		FLUCRIDE	NA	ppm	
FLASHPOINT	~~~~	DES/C	FHENCL	MA	DDM	
APUEDUS	20	%				
SOLID		*/	SEBULTE BY	ICAP ANALY	SIS	
OIL	70	*/ /*	***************************************			
FOLAR	14	%	TEST	FESULT	UNITS	
NONFOLAR	14	7.		ND @ 10	pom	
HALOGENATED	*		As	ND @ 10	DEW	
PHENOL	*	ppm	На	+ NI @ I		
		•	3€	ND 8 10		
CO	MMENTS		Pb	ND @ 10	n n m	
Somposite o		-4. A-9.	Ca	NE @ 10	pom	
A-10. A-13.			T N1	ND @ 10	•	
B-22. B-23.			Cr.	ND @ 10		
* Sulfide 1		•	Cr+6	NA	ppm	
			₽e	ND @ 1.0		
			Cu	ND @ 10	•	
* Haby co	old vapor		Fe	NA	ppm	
- ,	•		Co	NA	ppm	
	\bigcirc		Zm	ND @ 10		
	(10.1	11		` ` _		
LAB MANAGER:	- Chiliu	1) XXXX	HATE: 8	ber 57		
		========		========	======	=========
ACCEPT/REJECT:		REA:	BON:			
TSDF MANAGER:				DATE:		-
TSD FACILITY:		SPE	CIAL SCHEDULING	RED.:		-
		*************				-
TREATABILITY /	/ FLACEMEN	IT:			•	,
				·		

IT CORFORATION ANALYTICAL REPORT

WORK DRDER # M7-12-021 JOB # 89958

SAMPLE #

01 OF 1

Generator name:
Waste description:
Generating Process:
Volume / frequency:

IT-FAS MARTINEZ SA-B-22 LIQUIDS

PANNUTTI/PROTO MOLD

NA

HCVF DENSITY FH NORMALITY SON CN SULFIDE	RESULT 0 1000 5.4 .3 ND ND 0 2 ND ND 0 5	UNITS PDM G/L pH N % PPM PPM	TEST FORMALDEHYDE PCB PHENOL CRESOL HALOGENATED	GC ANALYSIS RESULT NA 1.3 * ND:25 NA * ND:25	UNITS. ppm mg/kg ppm ppm mg/l	
FORMALDEHYDE AMMONIA	ND @ 15	bbw bbw	CN RESULTS BY	IC ANALYSI		
FLUORIDE	NA	bbw FF	SULFIDE	NA	ppm	
XS OXIDANT	ND	: •	FLUORIDE	NA ⁻	ppm ,.	
FLASHPOINT	47	DES/C	PHENOL	NA	ppm	
ACUEOUS	Ωþ	%				
SOLID	22	%	RESULTS BY	ICAF ANALY	<u> </u>	
OIL	5 <u>0</u>	%	***			
FOLAR	. 2	%	<u>TEST</u>	RESULT	UNITS	
NONFOLAR	ND	%	Ti	ND @ 10	, .	
HALOGENATED PHENOL	ND *		As Ho	ND @ 10 * ND @ 1	obw	
r nenue	, *	pom		ND @ 10		
COM	MENTS		Pb	ND @ 10		
COMPOSITE OF		-3. A-6.	Ca	NE @ 10		
A-7. B-16. B			Ni	ND @ 10	•	
B-29, E-1, E				ND @ 10		
•		•	Er+6	NA	□pm 	
			Be	ND @ 1.0		
			Cu	ND @ 10	• •	
* Hg by col	d vapor		Fe	NA	bbw	
	\sim	_	Co	NA	ppm	
•	(10	- 1/1	Zn	ND @ 10	bbw	
LAS MANAGES		July 7	11/ DATE: 8	N-87		
LAB MANAGER:		12 1 AVIII	DATE: E	DEDI		
			:=============	========	=======	******
ACCEPT/REJECT:		REAS	ON:			
TSDF MANAGER:				DATE:		
TSD FACILITY:		SFEC	CIAL SCHEDULING	REQ.:		
	F.1 A ===================================	· ·				
TREATABILITY /	FLAUEMEN	i! :				
<u> </u>						

IT CORFORATION ANALYTICAL REPORT

WORL ORDER # M7-12-020 JOB # 89957 SAMPLE # 01 OF 1

Generator name: ITWaste description: SAGenerating Process: PAN
Volume / frequency: NA

IT-FAS MARTINEZ SA-B-25 SEMI SOLID PANNUTTI/PROTO-MOLD

	¬	, ,			
TEST	RESULT	UNITS	RESULTS BY		<u>.</u>
HCVF	40	ppm	TEST	RESULT	UNITS
DENSITY	1090	G/L	FOR:MALDEHYDE	NA	DDM
₽H	11.9	Ha	PCB	NA	wā∖kā
NORMALITY	0.6	N	PHENOL	NA	bbw.
SON	0	7.	CRESOL	NA	ppm
CN	ND @ 5	ppm	HALOGENATED	* ND/25	mg/l
SULFIDE	ND @ 2	ppm			
ORMALDEHYDE	ND @ 5	opm	RESULTS BY	IC ANALYSIS	3
AINOMMA	ND @ 15	pom	EN	NA	
FLUORIDE	NA	maa	SULFIDE	NA	DDM
X3 CXIDANT	SLIGHT		FLUORIDE	144	
FLASHPGINT	NA	DEG/C	FHENOL	-15-	೨ ೮೫
ADUEDUS	95	•/•			
SOLID	5	*/ /*	FEBULTS BY	ICAP AMAL 1	315
OIL	TRACE	••			
FOLAF	tJI.	7.	TEST	FEEULT	STINU
NONFOLAR	CM	•	<u>T1</u>	ND @ 10	225
HALOGENATED	CM		£	ND @ 17	DIM
PHENDL	NI G 5		H2	+ ND 6 1	ದ್ದಾಗ
	ł		Sa	NO 6 10	== =
6.3	MMENTE		₽t	NI @ 10	= D m
COMPOSITE O	F SAMPLE	# A-11.	Ca	ND @ 11	FDF
B1.8.9.10.1	2,14.15.1	7.18.19.	Ni .	. ND 6 10	
32 & D20.			Cr	NP 6 10	
			Cr+6	144	-
			₽e	ND @ 1.0	pom
			Cu	ND @ 10	•
* Ho by co	old vapor		Fe	NA	pom
-			Co	NA	ppm
			Zn	ND @ 10	ppm
	677	00			
LAB MANAGER:	- Thomas	N. Sa	DATE: /c	2-10-37	
		****			=====
ACCEPT/REJECT:		REA	SON:		
TSDF MANAGER:				DATE:	
TED FACILITY:		SPE	CIAL SCHEDULING	REO.:	
					
TREATABILITY /	/ FLACEMEN	IT:			

DERPORATION



896 Wattroird Way • Manney 11 and 04553 • 415,029,5100



CERTIFICATE OF ANALYSIS

- ... : Jim Reid

. January 8, 1988

RE: IT FAS - Pannutti/Protomold

Sodium perborate tetrahydiet

dame

· 32 #54

SPT Composite from C.4, D-9, C-11

M7-12-022

12/02/		480017.01.0	480017.01.05.03		
TEST	RESULT	UNITS	RESULTS BY	GC ANALYSIS	
HCVP	30	ppm	TEST	RESULT	UNITS
DENSITY	1000	G/L	FORMALDEHYDE	NA	ppm
PH	9.6	pH	PCB	NA	mg/kg
NORMALITY	NA	N	PHENOL	,NA	ppm
SON	NA	%	CRESOL	NA	ppm
CN	ND @ 5	ppm	HALCGENATED	NA	F 5
SULFIDE	ND @ 2	ppm		• • • •	
FORMALDEHYDE	ND @ 5	ppm	RESULTS BY	IC ANALYSIS	
AIMOMMA	ND @ 15	ppm	CN	NA	ppm
FLUORIDE	NA	ppm	SULFIDE	NA	ppm mqq
XS OXIDANT	SLIGHT	F.F.	FLUORIDE	NA	bom Lem
FLASHPOINT	ИА	DEG/C	PHENOL	NA	ppm
AQUEOUS	ИД	%		••••	F
SOLID	100	*	RESULTS BY	ICAP ANALYS	SIS
OIL	ND	%	1.500510 51		
POLAR	ND	8	TEST	RESULT	UNITS
NONPOLAR	CM	*	Tl	ND @ 10	ppm
HALOGENATED	ND	•	As	ND @ 10	ppm
PHENOL	ND @ 5	ppm	Hg	* ND @ 2	. mqq
11.21.01	115 6 5	PP	Se	ND @ 10	ppm
C	COMMENTS		Pb	ND @ 10	ppm ·
~	QUIDS		Cd	ND @ 10	ppm
SA # C4 -	Composite of	C4 D-9 C-	II Ni	ND @ 10	ppm
014 H 04	Composite of	- 1,0 1,-	Cr	ND @ 10	ppm
			Cr+6	NA NA	ppm
			Be	ND @ 1.0	
			. Cu	30	- •
* Haby o	cold vapor		Fe	NA	ppm ppm
119 119 119	JULIA VALUE		· Co	NA	ppm
		_	Zn	ND @ 10	
		•	211	ND 6 10	ppm

(i) If for this report truly represents the linding of sork partermed by me or under my droot supervision 1 4 surgwed and Approved

Show K. Bra

Rhonda Siederman

Laboratory Manager

Tom Cors Data Management Supervisor

N: \$ 125057 1

File Department of a

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896 W. John C. Mar. • Martino - California 94553 • 415-2 is 1110



CERTIFICATE OF ANALYSIS

. Jim Reid

January 8, 1988

RE: IT FAS - Pannutti/Protomold

Sa # Cirl

M7-12-022

12/02	2/87		480017.01.0	05.03	89959
TEST	RESULT	UNITS	RESULTS BY	GC ANALYSIS	5
HCVP		ppm	TEST	RESULT	UNITS
DENSITY		Ġ/L	FORMALDEHYDE	NA	ppm
PH		рĤ	PCB	NA	mg/kg
NORMALITY		Ñ	PHENOL	NA	ppm
SON	ND	%	CRESOL	11A	ppm
CN.	ND @ 5	ppm	HALCGENATED	* ND<25	mg/l
SULFIDE		ppm			-
FCRMALDEHYDE	_	ppm	RESULTS BY	IC ANALYSI	5
AMMONIA		ppm	CN	NA	ppm
FLUORIDE		ppm	SULFIDE	NA	ppm
MS CMIDANT			FLUORIDE	172	ppm
FLASHPOINT	NA	DEG/C	PHENOL	NA	ppm
AQUEOUS	, >98	%			
SOLID	~2	્ર	RESULTS BY	ICAP ANALY	SIS
OIL	ND	%			
POLAR	ND	8	TEST	RESULT	UNITS
NONPOLAP	ND	%	Tl	NA	~ -
HALOGENATED	*		As	ИА	
PHENOL	ND @ 5	ppm	Hg	NA	
			Se	NA	~ -
	COMMENTS		Pb	NA	
	Fuming on ex		Cd	NA	~ ~
	- reacted vi	.gorously	Ni	NА	-
with str			Cr	NA	
SA # B21			Cr+6	NA	
			Ве	NA	
			. <u>C</u> u	NA	
* Hg by	cold vapor		Fe	NA	
			, Co	NA	
			Zn	NA	ppm

i. Peciewed and Appropria

the following the state of the proper sports that the first of the the state of the s

Laboratory Manager

Tom Cors

FL. R. 2.

Data Management Supervisor





ANALYTICAL **SERVICES**



896 Waterbird Way • Martinez. California 94553 • 415-228-5806

CERTIFICATE OF ANALYSIS

Prepared For:

Jim Reid

Date: March 17, 1988

RE: Pannutti/Protomold

M8-03-064

Date Received:

PO Number.

Job Number

03/11/88

480017.01.01

90354

We received two liquid & 2 soil samples for the following analysis. The results are as follows.

ORGANICS ANALYSIS METHOD 8080 **PCBs**

COMPOUND	03101225 DRUM E-3	03101230 DRUM E-1	DETECTION LIMIT	03101255 AREA E	DETECTION LIMIT	UNIT
Arochlor-1016 Arochlor-1221 Arochlor-1232 Arochlor-1242 Arochlor-1248 Arochlor-1254 Arochlor-1260	ND<1.0 ND<1.0 ND<1.0 ND<1.0 ND<1.0 ND<1.0 ND<1.0	ND<1.0 ND<1.0 ND<1.0 ND<1.0 ND<1.0 ND<1.0 ND<1.0	1.0 1.0 1.0 1.0 1.0	ND<0.5 ND<0.5 ND<0.5 ND<0.5 ND<0.5 ND<0.5 ND<0.5	0.5 0.5 0.5 0.5 0.5 0.5	mg/kg mg/kg mg/kg mg/kg mg/kg mg/kg

:	03101330		
ANALYSIS	AREA B	UNIT	METHOD:
Phenols	ND<1	mg/kg	8040

I certify that this report truly represents the finding of work performed by me or under my direct supervision Rhonda Biedermann

Analytical Laboratory Manager

Reviewed and Approved

Tom Cors

Data Management Supervisor

Approved by the California State Department of Health.



ANALYTICAL SERVICES



896 Waterbird Way • Martinez California 94553 • 415-228-5806

CERTIFICATE OF ANALYSIS

Prepared For. Jim Reid

Date March 22, 1988

RE: Pannutti/Protomold

 M8-03-082

 Date Received
 PO Number
 Job Number

 03/15/88
 480017.01.01
 90368

We received nine samples for the following analysis. The results are as follows.

ANALYSIS	03151135 01A	03151215 02A	03151220 03A	03151155 04A	03151205 05A	03151235 06A	UNIT
Phenols Cresols	NEG NEG	NEG NEG	7076 49947	252 ND<50	NEG NEG	50 59	mg/l mg/l
ANALYSIS	ŧ	03151145 07A		03151230 08A		03151200 09A	UNIT
Phenols Cresols		128 ND<50		162 ND<50		81 26	mg/l mg/l

treath, that this report trul, represents the finding of

Rhonda Biedermann Super Son

Analytical Laboratory Manager

Reviewed and Approved

Tom Cors

Data Management Supervisor

Thomas R. Con

Approved by the California State Department of Health



ANALYTICAL SERVICES



17605 Fabrica Way • Cerritos, California 90701 • 213-921-9831 / 714-523-9200

CERTIFICATE OF ANALYSIS

Prepared for:

IT Corporation

4585 Pacheco Blvd. Martinez, CA 94553

Attn: Jim Reed

Date.

April 19, 1988

Date Received:

April 7, 1988

PO. Number

480017 Pannutti Job Number

45832/sds

Two (2) soil samples

The samples were analyzed for phenols using Method 420.1. The results are as follows.

Milligrams Per Kilogram

Sample

Phenols

P04061100

ND<2.5

P04061110

ND<2.5

ND - This compound was not detected; the limit of detection for this analysis is less than the amount stated in the table above.

I certify that this report truly represents the finding of work performed by me or under my direct supervision

Mary Hammons

Group Leader

Reviewed and Approved

Ken Faust

Technical Director

REFERENCE #3

Al Wayler:

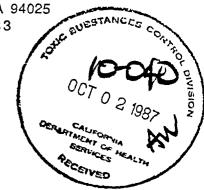
Sahnta Lee Pannutti 154 Oak Court Menlo Park, CA 94025

415-325-1333

September 28, 1987

Mr. Gabriel Dieb IT Corporation, FAS 4585 Pacheco Blvd. Martinez, CA 94553

Dear Mr. Dieb:



As per our telephone conversation on September 25, 1987, I am supplying you with as much information as I currently have available. I am still sorting through my father's records, and as I find any additional information that might be valuable to the clean-up operation, I will make it available to IT Corporation. I am sending a copy of this letter to Al Wangler at the DHS office, as well as copies of the inventory and formulations lists.

My father conducted business at 1390 Old Bayshore from approximately 1954 to 1978. first as "Panco Manufacturing" and "LAV Manufacturing," and later used a portion of the building (1976-77) as an adjunct (resin-cast framing shop) to his "Treasure House" business which was located at 305 San Antonio Court in San Jose. He also leased out the plastic shop, now occuppied by Joseph Brokowski, for several years (from about 1956-70) to Don Ottermat, now deceased, for the manufacture of cups to hold his "On Guard" solid toilet bowl cleaner, as well as miscellaneous injection-molded plastics (ie., lids for Alhambra water bottles). The main thrust of the manufacturing during those years was that of natural cosmetics, which were sold in health food stores (VAL; and Russelle Delle, manufacture taken over in 1978 by Russel Heide), and toilet bowl cleaner ("On Guard", "SanoMeter," subsequent manufacture of "On Guard" was taken over in 1968 by the AirChem Company, makers of Air Wick, 111 Commerce Road, Carlstadt, New Jersey, 07072), and miscellaneous household cleaners (Glo-Sheen Rug Cleaner, With-Eze Window Cleaner, etc.). I don't have formulations for all of these products, but the enclosed inventory list gives a pretty reliable account of what was used. Most of these chemicals, however, were probably already used up in the manufacturing process.

The front part of the building has continuously been rented out to various businesses, and since mid-1970, my father discontinued any operations at 1390 Bayshore and moved his offices to "Treasure House" at 305 San Antonio Court, which building the family still owns and rents out.

Prior to my father's purchase of the building, it was owned by "Doc" Clyde McCoy (now deceased) and was known as the "Pyro-Penn Company." His widow, Lucia McCoy can be reached at 1125 North 2nd Street, San Jose, 95112.

I have enclosed names of some of the previous employees and tennants, however I do not know if all addresses are current. Jose Benavides, jr. was his foreman much of the time, and could answer questions more accurately than anyone else, and possibly supply you with additional names if necessary. My brother, Tony (408-923-9001) may also be able to answer further questions, as he was more involved in day-to-day operations than I was.

Some of the current tennants:

Joseph Brokowski (dba ProtoMold) 408-258-3340 (home) 408-288-8353 (business)

M.E Greuner (dba CBS-Construction Barricade Services) (recently filed for bankruptcy) 616 Derby Avenue
Oakland, CA 94601
POB 2777 Diamond Station
Oakland, CA 94062
415-532-1232

Al Leake, Jr (dba PMA) 695 Creek Drive Boulder Creek, CA 95006 408-338-2715 408-476-6100 (Howard Tracy is new owner of PMA as of 8/87) 408-437-0603

Some previous tennants were:
(addresses and phone numbers may not be current)

Ed Dillon (woodwork, and cabinetry) 2415 Rinconada Drive, #21 San Jose, CA 95125

Virginia's Mirrors (1979-82) 3467 Ramstead Drive San Jose, CA 95127

Bob Marshall (dba Marshall-Whittley Promotions) (1979-81) 1676 Merrill Loop San Jose, CA 95124 408-265-0867

Eli Barrientos and Luis Torres (dba MCS Multiple Chemical Suppliers-janitorial/cleaning supplies) (2/82-6/82) 408-298-9713

Delano Welding (8/84-11/84) 1038 Bellhurst San Jose, CA 408-297-6350 Some of the previous employees of my father (these should all be current):

Jose Benavides, jr. (approx. 1958-75) 1717 9th Avenue Delano, CA 93215 805-725-1014

Hector Benavides (approx. 1960-63) 2667 Taffy Drive San Jose, CA 95148 408-274-7547

Jack Haynes (approx. 1973) 408-374-8461

Nick Alvarado (approx. 1958-64) 4169 San Miquel Way San Jose, CA 95111 408-226-9692

Frankie Edwards (approx. 1956-65) 2649 Madden Avenue San Jose, CA 95116 408-926-1669

Sincerely,

Sahnta Lee Pannutti

cc: Al Wangler, Ernest Nakaji

October 2, 1957

Notes on D-Icer.
This product should not be put up in Pressurized cans as the cer owner will want to use it in his Hood Jar to prevent freezing.

Tested several fromulas during the winter back East.

Formula should be a cure all. To remove Oil and Road Film, Prevent Freezing at -10° F. and to be used directly on the Windshield to remove Ice. ADP

Pour Borax into Glycerine and mix well to disolve. Add Isopropyl.Add NI-W and mix well. Add color and bottle.

Results----

Harry Com

Pellet Powder 2-15-58 Kake 1600 Lbs or 45 36 Lb Batches.

Check for color by using 2.8 Grams powder to 32 Ozs. water.

```
· Oze.
 Oxytricarbellylic acid ----- 4.00
 Hydrowet DB ----- 5.00
 NaHAP Granular ----- 6.00
 NaHCO3 Granular ----- 16.00
 Dichromate Powder (Potassium) ---- .25
30.25 0zs.
 Kix in order written. Mix well and press pills.
Results---This formulation sticks in pill machine. Should work well when mixed with the ground powder from about 90 Lbs of #9 & #10. \cdot
- Container 1/2 Lbs
                                     .25/
44.25
Mix together in day mixer, for about 10 Minutes. Press pills.

12/Ade 260 Lbs powder. 18 to the or or 280 per L.

Ellough for 75 hi Starts
 NOTE---Pils pressed & sent to Blackburn wiighed 1.5 Grams each.
 The new ones are to weigh 2 Grams each.
 To make 50Mnew Gient pellets will take approximately 250 Lbs Powder.
 Use this formuba----
 Hydrowet DB ----- 8.00
 Oxytricerbellylic scid ----- 5.00
NaHMP powder ----- 12.00
 NeHCO3 ---- 30.00
DiChromate Pwdr. --4 Ozs. 30.00
Reground Giant pellets Pwdr. ---- 30.00
60.00 Lbs.
 Lake 4 --- 60 Lb. Batches. or approx. 240. Lbs.
Spray N Kleen Giants # 3 ----Wall-Kleen & For Stainless Steel-Grease Removal.
.01
                                                                       .60
                                                                      1.19
                                                                      4.64
 Make 8 36 Lb. Batches or 288 Lbs. Make pellets 2.25 Grams each
                                                                  or 134 ~0.
 or 200 per Found of powder. Lake 50,000
Results --- Color OK, Good Efferv. This is a terrific De-Greaser tablet.
 NOTE -- Spray N wheen Giants # 3 Formula can be made to whigh only 1.66 Grams
or 274 per Lb of powder. The material has a low compression because of the
 8 lbs of DB in the formula.
```

5-2-56

Spray N Kleen GLANTS # 1

19. . "Jar

```
Spray N Kleen # 27 4-9-57
   Oxytri--- Anhyd ------ 4.00

Hydrowet --DB-------- 3.00

K.Bichromate 50%, NaHCO 3 50% ----- 50 used 10 0ZS.

NaHCO 3 Granular ------ 2.00

NaHLP ------- 4.00
   NaHCO3 Pwdr. ---- 21.50
 Lix in Day mixer for 10 Linutes. Screen and put in Drums for Rotary press
 at CPL. This formula does not cause sneezing at all when mixing. ADP
                                       Note-should have some oxytri. For Faster Effert. THIS IS A VERY GOOD ONE. ADP
 Spray N Kleen # 28 4-11-57 Grams NaHLP pwdr ----- 20.
 DB -----------------------3.
 35.
 Results -- Fellet disolves fast. Swils up and breaks up before disolving
very well. Seems not to leave any film even when not wiped clean.

Spray N Kleen # 29 4-11-57 Grams
 Borax --- 8.
 Results ---- Efferv is slow.
 for rotary press at CrL. Use 7/16 Dye.Pellet weight should be .65 Grams
 each or 700 per Lb of powder.
 Results---
 Uranine 50--25%, Nanco3 75%--1.0z.
                                      ----- 08. -----
                                                     --- .05
4.57 per 36
                                 36.00
 Mix in Day Lixer for 10 minutes. Screen.
                                                      or 12.4 ¢ Lb.
 Put in drums for Rotary press at CFL.
```

p . ""

Vitro Kleen # 37 8.00 Citric Acid -----DB Nacc ----- 16.00 NaHMP --Enough for approx.10,000 Pellest. Soap Green B ---- 3. Grams. Grind Citric in Mortar.Add ingredients of A and mix. Add Color to a portion of B and mix well, in mortar. Screen and mix well A and B. Press Pills. NOTE--Add only small part of ground broken pills to each Jar of powder as it changes compression ratio.

Results --- Disolves a little foo slow. -Vitro Kleen # 38 9-5-55 025. Citric scid (ground very fine) -----10.00 BB Nacc ----16.00 NaHMP ----Soap Green B-----3. Grams Grind Citric in Mortar or Grinder to fine flour. Add ingredients of A and mix. Add color to portion of B in morter and mix well. Add A & B together and screen several times. Add small amount of ground pellets to this powder as too much will change compression ratio. rested 2-15-57 Effice

а_{рион} : тат

saff.

Memorandum

To ' Files Date:

March 12, 1986

Subject:

Protomold site visit 3-6-86

From : Denise Kato

Persons present:

Tony Panutti, Denise Kato

Purpose of meeting: Determine site history and assess the number and contents, if possible, of drums on-site.

History: Panutti's father rented the property and opted to buy it in the late 1960s. His primary business there was manufacturing The company was known as Lav Manufacturer and sold specialty cosmetic products under the names "Lav," "Russell Dulla," and "Sanimedics." The primary compounds used in cosmetics were stearates, lanolines, "flex resin," and polyglycol. They also cleaning compounds. Panutti didn't manufactured know compounds other than boraxes were used to make the cleaning also was unaware of production products. He rates manufacturing specifics. I asked if there had been bad batches or disposal of hazardous wastes. Panutti said a lot of drums went to Lorenz. Bad batches were usually remixed, and they didn't usually have production problems.

The father was a chemical engineer and also did research and consulting at the site. The family also ran a small woodshop on site up to about 10 years ago. The Panutti's leased space out also. The plasterwork was down by a woman named Virginia Juarez. A lot of debris in the back yard area was left by her, according to Panutti.

Current site status: The buildings on site are currently leased by Protomold, a plastics molding company [contact: Joe Brokowski, (408)288-8353] and General Repairs California Truck Service [(408)297-9339].

The drums originally found by the Abandoned Site Project in the back yard area in December 1981 are still there. There is a lot of debris in the back including plaster, a pile of empty 5-10 gallon metal containers, including paint thinner cans, a pile of empty glass bottles, wood and metal planks and wood pallets. Dirt seems to be mounded into one big pile spread over most of the yard, which was overgrown with weeds.

There were about 52 drums. Most were in fairly good condition and shut tight with bungs. About 26 silver drums along the back fence are labelled sodium perborate tetrahydrate. One of these silver drums was open and contained a white solid that looked and smelled like shortening. About 6" of brown water, probably accumulated from rains, lay over the solid and had a pH=9 when measured with test paper.

About half the non-NaBO3 labelled drums seemed empty when shaken or tapped. Most of the non-NaBO3 drums seemed to be unlabelled. One empty drum was labelled acid. A drum in the northeast corner of the yard labelled acetone was swollen. Another unlabelled drum in the northwest corner of the yard was also swollen.

Mr. Panutti volunteered to look through old P.O.'s and other records for information on the types of chemicals used at the site which might be in the drums. He also mentioned his sister, Gina Benhken of Menlo Park, was also involved in the business and might have more information. The number he gave me to reach her was incorrect, but I later found out that she was the next to youngest member of the family and wouldn't have much information or memory of site operations.

Panutti also volunteered to open the drums at a later date so I could sample them. I said the burden was on him to find out what was in the drums. I said that if the material in the drums was really sodium perborate, he could probably treat it with water and dispose of it to the sewer, if he could get the sanitation district's approval. I said the rest of the drums would have to be characterized and handled appropriately.

•

Date





DEPARTMENT OF HEALTH SERVICES 215) BERNELEY WAY

SERKFLEY CA 94704



REPORT OF HAZARDOUS SUBSTANCES CLEANUP BOND ACT EXPENDITURE PLAN MODIFICATION

to I	Health and S	espectfully substance code control to the control of the code code code code code code code cod	Section		and Sect	
I.	Name(s) of 'H	azardous Wast	te Site(s	,	•	•
	Protomold					
II.	Nature of Up	date:				
	(a) ch	ange is prio	rity rank	ing of si	.te.	
	(b) X ad	dition of nev	site to	Expendit	ure Plan.	•
	(c) tr	ansfer of fur	nds among	sites.		
	(d) tr	ansfer of sit	e among	listing o	ategories	5.
II.	Explanation	of Need for 1	Modificat	ion:		•
	been transfe a number or residuals fr formerly oc required to extent of co	rred to a new f containers com the cosm cupied the determine the ntamination.	w owner a on site etics ma site. This is	and the pie. Thes nufacturi Sampling f compoun a potent	revious of contains operations and anades of the contains operations of the contains of the co	owner left iners are tion that alysis is at and the site.
īv.	Approval of	Reviewing Off	cicer:		د میگیده در این	
'			Regional	Section	Chief	2H 18-3-81 Date
		•	Deputy D	irector		Date
					1	

Chief Deputy Director

REMEDIAL ACTION CERTIFICATION FORM (Please type or print in black ink only) Instructions for completion on reverse.

Proto Mold									
1390 Old Bayshore Road, San Jose									
Santa Clara	Santa Clara APN: 237-06-014								
A. List any other na	ames that have been used to identify sites:								
B. Address of site i	f different from above: None								
C. Assessor's Parcel	Numbers: None '-								
	Numbers: None (Use extra pages if necessary.)								
Responsible Parties:									
Responsible Parties: Name: Sahnta Pannutt	(Use extra pages if necessary.) ti Name:								
Responsible Parties: Name: Sahnta Pannutt Title:	(Use extra pages if necessary.) ti Name: Title:								
Responsible Parties: Name: Sahnta Pannutt Title: Firm:	(Use extra pages if necessary.) ti Name:								
Responsible Parties: Name: Sahnta Pannutt Title: Firm: Address: 154 Oak Co	(Use extra pages if necessary.) ti Name: Title: Firm:								
Responsible Parties: Name: Sahnta Pannutt Title: Firm: Address: 154 Oak Co	(Use extra pages if necessary.) ti Name: Title: Firm: Ourt Address:								

3.	Brief Description and History of the Site: (Include previous and current uses of site, a brief description of the cleanup action and concentrations of significant hazardous substances left on site) Site was identified by the Abandoned Site Program on
	March 31, 1982. Site was a small cosmetics and home cleaning
	products manufacturer. Approximately 90 drums had been left in
	rear portion of the site. RP conducted testing of drum contents.
	Phenols were the only hazardous substances detected, and were
	found in only a few drums. Soils were sampled for phenols, no
4.	soil contamination was discovered. Drums were disposed of offsite and phenols were sent for incineration out of state. All phases of remediation at the site were completed on July 29, 1988. Type of Site: (Check appropriate response)
	Included in Bond Expenditure Plan?
	Yes X No
	RCRA-Permitted Facility Bond - funded
	RCRA Facility Closure RP - funded X
	*NPL
	Federal Facility
	Other (i.e., walk-in): Explain Briefly:
	·
5.	Size of Site: (Based on Expenditure Plan definition of size)
	Small X Medium Large Extra Large
6.	Dates of Remedial Action
	a. Initiated 10/27/87 b. Completed 07/29/88
sc	r SARA, any NPL site that is not permanently cleaned must be heduled for a follow-up visit after 5 years to verify that cleanup asures are still satisfactory.

7.	Res	ponse Action Taken on Site: ((check appropriate action)
		sampling) Final Remedial Action RCRA enforcement/closure ac	gation verified that no cleanup
	Α.	Type of Remedial Action (e.g. on-site treatment): Characte	Excavation and redisposal erization and removal of
		approximately 90 drums onsite	e. Soil sampling indicated no
		soil contamination.	
	в.	Estimated quantity of waste as tons/gallons/cubic yards) which	associated with the site (i.e., ch was:
		1 treated	Amount:
		 untreated (capped sites 	Amount:
		3. X removed	Amount: 4000 gallons
8.	Cl	eanup Levels/Standards	
-	a.	to the final remedial act cleanup occurred as the resinterim remedial measures RAP)?	dards established by DHS pursuant ion plan (RAP) or workplan (if sult of a removal action (RA) or (IRM) prior to development of a ed from the site: no soil contamination was found.
	b.	Were the specified cleanup :	standards met? Yes X No
	c.	If "no", why not:	
9.	DHS	Involvement in the Remedial Ac	ction: Please See Attachment 1
	Α.	Did the Department order the Pyes No_X Date of order	Remedial Action?
	в.	Did the Department review and action and indicate date of re	eview/approval if done):
X		Sampling Analysis Procedures	Date02/09/88
X		Health & Safety Protections	Date 10/16/87
<u> </u>		Removal/Disposal Procedures	Date 02/09/88
Х		Removal Action Plan	Date02/09/88

c.	If site was abated by a responsible party, did the Department receive a signed statement from a licensed professional on all
	Remedial Action? Yes NoX Dates (from) (to)
D.	Did a registered engineer or geologist verify that acceptable engineering practices were implemented? Yes No_X Name Date of verification
E.	Did the Department confirm completion of all Remedial Action? Yes X No Date of verification August 2, 1988 (i.e. manifest, sampling, demonstrated installation and operation of treatment)
F.	Did the Department (directly or through a contractor) actually perform the Remedial Action? Yes NoX Name of Contractor:
G.	Was there a community relations plan in place? Yes No X
н.	Was a remedial action plan developed for this site? Yes No_X
r.	Did DHS hold a public meeting regarding the draft RAP ? Yes No
J.	Were public comments addressed? Yes No_X Date of DHS analysis and response:
K.	Are all of the facts cited above adequately documented in the DHS files? Yes X No
	If no, identify areas where documentation is lacking
EPA	Involvement in the Remedial Action:
A.	Was the EPA involved in the site cleanup? Yes NoX
в.	If yes, did EPA concur with all remedial actions? YesNo
c.	EPA comments
	EPA staff involved in cleanup: (Name, Title)
	(Address, Phone Number)

10.

11.	ct:	er Regulate	Regulatory Agency Involvement in the Cleanup Action:						
	Age	ency:	Activity:						
		RWQCB	None						
		ARB	None						
		CHP.	None						
	*************	Caltrans	None						
		Other	None						
	Nam	e of contac	et persons and agency:						

12.	Pos	t-Closure A	ctivities:						
	Α.		be post-closure activities at this site? (e.g.						
			and Maintenance) Yes No						
		If yes, de	escribe:						
									
	В.		closure plans been prepared and approved by the Yes No X						
	C.	What is thoperations	e estimated duration of post-closure (including and maintenance) activities? 0 years.						
	D.	Are deed r	estrictions proposed or in place? Yes No_X						
		County rec	ave deed restrictions been recorded with the corder? Yes No Date						
			ns are recorded?						
		Who is the	Division contact? Name/Phone Number						
	E.		ecovery been initiated? Yes No_X						
	•		count received \$; % of DHS costs.						
		-,- 2 ,							

16. Certification of Remedial Action:

I hereby certify that the foregoing information is true and correct to the best of my knowledge.

ı.	alfred Waven	10/6/88
	Project Manager	Date
2.	Jusan Solas	10/6/88
	Sr. Project Manager, Site Mitigation	Date
3.	Unit orige	10//3/88 Date
4.	Dwill 1. Home	18/13/er.
	Regional Section Chief	/ Dáte
5.	Me non los	10/0/80
	Registered Engineer Septogist	/ Datě

ATTACHMENT 1

- 9 A. The Responsible Party has voluntarily conducted all characterization and removal activities. The Department has not issued a remedial action order or entered into an enforceable agreement with the Responsible Party. DHS will recover all costs.
- 9 C,D. The Responsible Party completed a removal action which involved the removal and disposal of 90 drums, of which 8 contained phenols, under oversight by the Department. The removal action resulted in a final remediation of the site. Post-removal sampling results analyzed by a DHS certified laboratory indicated that no residual soil contamination was present.
- 9 G. No community relations plan was developed prior to conducting the removal action for this site because the site is situated in an industrial area and there were no known community concerns. Post-removal sampling indicated that there was no contamination at the facility.
- 9 H. No Remedial Action Plan (RAP) was developed pursuant to Health and Safety Code Section 25356.1(g) because the removal action resulted in a final remediation of the site.
- 9 I. As stated in 9G and 9H, a draft RAP was not developed and no public meetings were held.

RESPONSIBLE PARTY-LEAD SITE CLEANUP WORKPLAN

PROTO MOLD

I. Site Information

A. Location and Type of Site

1390 Old Bayshore Highway San Jose, CA 95112 Santa Clara

This site was used in the 1960s and 1970s to manufacture cosmetic products, cleaning compounds, plaster statues and as a chemist's research and development workshop. Currently, it is leased to a truck repair service and plastics molding company.

B. Description of Hazardous Wastes

Approximately 50 drums have been stored or buried on site. About half of these drums are labeled as sodium perborate. Contents of the other drums are unknown. A pile of empty five- and ten-gallon metal containers, including paint thinner cans, is stored on site.

C. Threat to Public Health and Environment

There may be soil contamination and a potential for ground water contamination. Sodium perborate may be stored with organic compounds; this poses a fire hazard.

The degree of health hazard posed by chemical contamination of a site depends on the concentration of the material present and the duration of exposure. DHS policy is to evaluate all listed hazardous waste sites for the need to take action to abate any acute public health or environmental threats posed by a site. Therefore, the threats described in this document generally represent the potential impact of long-term exposure to specific hazardous substances if: 1) the site is not abated, 2) the substances migrate off site, and 3) the substances at some point come into contact with human or environmental receptors.

II. Site Status

A. Status of Site Activity

Drum sampling and removal activities began in October, 1987. DHS is working with site owners and their consultants to develop a soil sampling plan to characterize the site. Soil sampling is expected to begin in early 1988.

DHS is waiting for confirmation of the court approved sale of the property requiring current site owners to pay for all costs associated with site characterization and mitigation.

B. Projected Revenue Sources

The site owners have been directed to conduct characterization activities. If they fail to complete characterization and cleanup activities, DHS will issue a remedial action order or enter into an enforceable agreement with the responsible parties. DHS has budgeted \$30,000 for oversight/monitoring of cleanup efforts. DHS will recover 100 percent of direct costs plus staff costs and overhead related to the project. The responsible parties will pay all costs associated with remedial investigations and cleanup activities.

III. Project Completion Estimates

The estimates shown below reflect completion of major site cleanup phases based on current information regarding this site and responsible party cleanup plans and completed actions.

	Task Group	Estima Comple	
1.	Site Characterization ·		
	a) Remedial Action Orderb) Remedial Investigation/ Feasibility Study	June March	1988 1988
2.	Remedial Action Plan	June	1988
3.	Remedial Action		
	a) Design b) Implementation c) Certification	Aug. Oct. Dec.	
4.	Cost Recovery and/or Operation and Maintenance		
	a) Cost Recovery b) Operation and Maintenance	Dec. N/A	1989

Super	IORITY	-	MATERIALS SAMPLE ANA	ALYSIS REQU	HML No. B1568
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HML.# B/S69 to B/568

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Collector's Name Denis	se Kato	by La	Received 4/2	186
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Reference: HML v	nethods	•		
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California Department of He	alth Samires - Har	andoue Matoria	ic Laboratory	

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LABORATORY REPORT

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Collector's Nam			•	′ 		
Sampling Location Protocold Collector's Sample i					# DK-Prop-c1 to	
1390 old Bayshare Huy, Sanfore ea					Dr. Proh-cz	
Analytical Proc	edures Used: Na hy	A.A. after can	c HNO3 diges	tin		
	ing primeter 125 after	U .	U		buffers	
Boron by	Carmine netted	Standard method	Boell)			
		•	*	٠		
Reference:	HML & Std.M	ettod Brok.				
ANALYSIS RESULT	S:					
HML *	Callector#	Na (ug1gm)	Beron (ug/gm)	pH	Dilution for PH	
B 1568	DK- Proto-01	31000	110	9.3	(20-60)	
g 1569	DK - Proto -02	56,800	. 650	ક.ં8	(20-100)	

Analysts' Signatures: date

California Department of Health Services - Hazardous Materials Laboratory



DEPARTMENT OF HEALTH SERVICES 2151 BERKELEY WAY BERKELEY, CA 94704



March 25, 1986

Tony Panutti 1524 Santa Maria San Jose, CA 95125

Dear Mr. Panutti:

PROTOMOLD PROPERTY, 1390 OLD BAYSHORE HWY., SAN JOSE

During your meeting with Denise Kato at the subject site, the presence of several drums suspected of containing hazardous wastes was confirmed. These drums have apparently been stored at the site since your family discontinued manufacturing processes there several years ago. This storage is a violation of Section 66508(a) of Title 22, Division 4, Chapter 30 of the California Administrative Code.

At this time the Department directs you to submit a sampling and analysis plan to characterize the contents of the drums stored on site. The plan should contain, at a minimum, the following elements:

- 1. An implementation schedule; -
- 2. The methods and equipment to be used to obtain samples;
- 3. The methods to be used to analyze the samples;
- 4. A Quality Assurance/Quality Control plan for sampling and analysis;
- 5. The names of the person(s) or firm(s) who will be collecting and analyzing the samples;
- 6. A site health and safety plan; and,
- 7. Provisions for preparation of a report summarizing drum characterization activities and findings.

It is highly recommended that you retain the services of a company experienced in dealing with hazardous wastes to assist you in developing and implementing the plan.

Finally, your attention is directed to Section 25189 which provides for civil penalties up to \$25,000 per day per violation of the Administrative Code pursuant to California Health and Safety Code Section 25189.

If you have any questions or comments, please contact Denise Kato at (415) 540-2043.

Sincerely,

Dwight K. Hoenig, Chief

Toxic Substances Control Division North Coast California Section

cc: Sahnta Panutti
Lee Esquibel, Santa Clara County
Hazardous Materials Section

DEPARTMENT OF HEALTH SERVICES 2 51 EEPKELEY WAY EEPKELEY, CA 94704



December 3, 1986

Tony Panutti 1524 Santa Maria San Jose, CA 95125

Dear Mr. Panutti:

PROTOMOLD, 1390 OLD BAYSHORE HIGHWAY, SAN JOSE, CA

In a letter from the Department dated March 25, 1986, you were directed to submit a plan for the sampling and analysis of drums at the subject site.

We recently learned by chance that arrangements had been made to remove the drums from the site when Marge Bosetti, the realtor handling the property, called to request information on EPA ID numbers. The removal arrangements were made without the submittal of a sampling and analysis plan, contrary to the Department's March 25th directive.

We appreciate your desire to sell the property in order to settle the estate (currently in probate) as soon as possible. However, because it is a State Superfund site, the State must be involved in characterization and cleanup work to ensure that activities are conducted properly. We cannot remove the site from the Superfund List unless we are assured that investigation and cleanup have been thorough and complete.

In the interest of expediting work on the site, we are willing to allow the removal of drums without submittal of a sampling and analysis plan, provided you agree to the following:

- The work will be done by a company and under the supervision of an individual experienced in dealing with hazardous wastes;
- 2. All hazardous wastes on-site are properly identified, transported by a registered hazardous waste hauler under manifest to an unauthorized hazardous waste disposal or treatment facility;
- Copies of all analyses and documentation of hazcatting of drum contents are provided to the Department;
- Copies of all manifests completed to dispose of the wastes are provided to the Department;
- 5. An inventory of the number of drums, their contents, and where they were taken is provided to the Department;

- 6. At least seven days advance notice is provided to the Department prior to drum removal activities so a Department representative can be on-site to observe work;
- 7. All other applicable laws and regulations dealing with hazardous wastes are complied with.

Also, prior to delisting, there must be some sampling to determine whether there is any soil contamination at the site. We request that you submit a soil sampling and analysis plan to us which contains, at a minimum, the following elements:

- Proposed sampling locations;
- Sampling and analytical methods;
- 3. Rationale for selecting sampling locations and the analytical methods;
- 4. Chain of custody procedures;
- 5. Quality assurance/quality control procedures to be used for sampling and analyses.

Finally, enclosed are copies of analyses of samples taken from two drums by Denise Kato during a site visit on March 6, 1986. The results indicate that the white material in the two drums could not be sodium perborate; rather, it appears to be a compound similar to hand soap. If the entire contents of the drums are this soap-like material, it is probable they would not have to be disposed of as hazardous wastes.

If you have any questions or comments, please contact Denise Kato at (415)540-3401. Please also feel free to refer any prospective buyers of the site to Ms. Kato.

Sincerely,

Jerome R. Marcotte, Senior Waste

Serome R. Marcotte

Management Engineer Site Mitigation Unit

North Coast California Section Toxic Substances Control Division

JRM: dk: tmk

Enclosure

cc: See Attached List

CC MAILING LIST

Kenneth Potstada 2995 Woodside Road, Suite 400-410 Woodside, California 94062

Marge Bosetti
Bosetti Properties and Investments
10320 South De Anza Boulevard, Suite 1B
Cupertino, California 95014

Lee Esquibel Santa Clara County Health Department 2220 Moorpark Avenue San Jose, California 95128

Mike Rudolph City of San Jose Hazardous Materials Unit #4 North 2nd Street, Suite 1100 San Jose, California 95113-1305 REFERENCE #11



April 13, 1987

Department of Health Services 5850 Shellmound St. Emeryville, California 94608

Attention: Robert Crandall

SUBJECT: CONTAMINANT VERIFICATION AND CLOSURE AT PROTOMOLD PROPERTY, SAN JOSE

IT PROJECT NUMBER 480017

Dear Mr. Crandall:

IT Corporation (IT) is pleased to submit this contaminant verification approach to Bosetti Properties and Investments. IT has extensive experience in all phases of remediation planning, design, risk assessment and hazardous waste management response. All verification work will be completed under the guidelines and requirements of the USEPA, California Department of Health Services, California Regional Water Quality Control Board, CAL OSHA, local agencies and IT Corporation.

BACKGROUND

The Protomold facility is located at 1380 Old Bayshore Highway, San Jose, California. In the past, this facility manufactured cosmetics and plaster castings. Facility operations have been discontinued, but a building, drums, containers and other sundry debris litters the site. IT conducted a site reconnaissance and the following was observed:

• Approximately 50 to 70 fifty-five gallon drums were stacked at various locations on the site. The majority of drums have material in them. Some of the open drums may contain rain water. Some drums appear to be under pressure and are suspect of containing acetone or other volitale substances.

- Approximately 20 five-gallon containers with D.O.T. flammable labels are scattered on the site.
- Two abandoned automobiles and other structural debris are on site blocking access to the major drum storage location. These must be removed to access the drums.
- Numerous other litter such as quantities of glass bottles are scattered around the site.

Bosetti Properties & Investments' primary objective is to have the above property certified as contamination free. The goals to meet this objective are to verify if hazardous waste contamination exists on site, assess the degree and extent of contaminants, and to remediate the problem.

SCOPE OF WORK

The work scope to meet Bosetti Properties & Investments' goals and objectives is presented in three phases:

Phase I - Environmental Investigation to Verify if Contamination Exists.

Phase II - Development of a Corrective Action Plan.

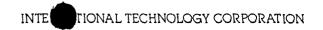
Phase III - Implementation of the Corrective Action Plan.

The environmental investigation phase will confirm if contamination exists and which specific areas are contaminated. Since Phases II and III are contingent on results from the Phase I environmental investigation, this work scope will only address itself to Phase I.

PHASE I ENVIRONMENTAL INVESTIGATION

The environmental investigation phase will be used for problem definition and

Robert Crandall
CA. Dept. of Health Services
April 13, 1987
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will include a thorough site investigation. IT will evaluate the condition, content and quantity of the various sized drums and containers; check for existing drainage lines and collection sumps; and identify areas of potential ground surface contamination.

Task 1 - Data Collection, Kick-Off Meeting and Data Review

An initial kickoff meeting will be held between key IT team members, and Bosetti Properties & Investments. This meeting will be held to:

- provide an initial joint site visit
- discuss overall project objectives and approach
- obtain background data and information
- · discuss areas of sensitivity
- promote a cooperative attitude among project participants

All readily available background data will be reviewed to provide the basis for additional data requirements, if necessary.

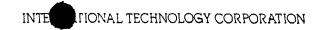
Readily available data will include:

- Protomold records
- public discharge records
- assessors maps
- aerial photographs

If possible, former employees that were at the facility will be interviewed.

From the IT site reconnaissance, it is evident that some form of contamination is present on the soil surface around the drum storage areas in addition to areas around abandoned equipment and select debris areas.

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Current aerial photographs of the area will also be evaluated to ascertain if a topographic map can be reproduced of the site and proximal area.

Task 2 - Prepare a Health and Safety Plan

The site visit and existing data will be the basis for the site specific Health and Safety Plan. This plan will define:

- decontamination requirements
- air quality requirements
- toxicological risks
- protective equipment requirements
- clean and contaminated zones

The site specific Health and Safety Plan will develop clear delineation of responsibilities for the on-site survey personnel. All site project work will be performed under the guidelines of the plan in accordance with applicable 'federal, state and local requirements. In general the Health and Safety plan will be commensurate with the site risks.

As conditions change, or if new operations are to be performed, the existing Health and Safety Plan will be modified or amended or a new Health and Safety Plan shall be developed.

Task 3 - Prepare Quality Assurance/Quality Control Plan

IT has a formal, internal Quality Assurance/Quality Control to establish policies to facilitate the implementation of regulatory requirements and to provide an internal means for control and review so that the work performed is of the highest professional standards.

The responsibility for the overall direction of the QA/QC Program rests

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with IT's Corporate Director, Quality Assurance. A full-time, professional staff is responsible for maintaining the QA/QC Program and verifying its implementation through operations audits.

The program is documented in two IT Quality Manuals. The policies and procedures specified by the manuals define acceptable practices to be employed by personnel. The IT Quality Assurance Manuals are controlled documents which are considered proprietary information, but applicable documents can be supplied to regulatory agencies.

This project will be performed in conformance with applicable federal, state and contract requirements, and QA/QC Program requirements. Project objectives follow.

- Scientific data generated will be of sufficient quality to withstand scientific and legal scrutiny.
- Data'will be gathered or developed in accordance with procedures appropriate for the intended use of the data.
- Data will be of documented and acceptable sensitivity, precision, accuracy, representativeness, completeness, and comparability as required by the project.
- Work will be conducted in a safe manner and in accordance with all applicable federal, state, and local laws. In addition, operations shall conform to standard construction practices for work of this type.
- A premium will be placed on the health and safety of all personnel associated with the project, as well as to the surrounding community.

- The degree and types of waste for disposal, both solid and liquid, will be assessed.
- All records will be the property of Bosetti Properties & Investment and considered confidential except where required to be made public by law.

Task 4 - Site Survey and Monitoring Location Selection

The site survey will establish a plot plan and topography. The basis for this plot plan is to:

- locate all structures and appurtenances both surface and subsurface
- · locate all scattered debris and equipment
- · locate accurate property lines
- illustrate on-site/off-site drainage patterns
- catalogue all drums and containers and their contents

The basic need for this survey is to locate the proposed soil monitoring locations in addition to locating clean areas for potential decontamination stations.

The topographic map of the site will be of adequate scale and contour to facilitate working engineering drawings.

Task 5 - Site Preparation/Field Monitoring/Sampling/Analysis

The Site Preparation/Field Monitoring/Sampling/Analysis task consists of the following individual elements.

<u>Site Preparation</u> - The site is confined within a fenced area on three sides and a building on the fourth side. There is limited space for

operations in this present condition. The following will be carried out to prepare the site for safe work conditions.

- Removal of loose debris and abandoned cars and placed in a consolidated area where it cannot hinder work operations.
- All drums that are stacked shall be safely lowered to ground level for sampling and inspection.
- All debris will be catalogued.

Field Monitoring - Field monitoring will consist of the following:

- The site will be checked with a metal detector to locate metal piping and subsurface storage tanks.
- Visible spill stains on soil areas will be checked with a portable HNU or Photovac meter for volatile organic carbon detection. Positive results will reflect type of laboratory test requirements.
- Drum and container contents will be checked with a Hazcat kit for compatibility.
- All drums and containers shall be labelled.

Sampling - Sampling will consist of the following:

• Compatible contents from drums and containers will be composited to reduce number of samples. For budgetary purposes, collection of 2 composite samples are assumed.

• Surface soil samples will be taken in each major visible stained area. For budgetary purposes, it is assumed that 5 stained areas will be sampled.

<u>Analysis</u> - Laboratory analyses will consist of the following:

- Liquid samples from drums and containers will be analyzed with a predisposal test that will illustrate the contents in a broad aspect.
- Analyses for soil samples are contingent on the Photovac meter readings. Analyses will be for volatile organics or acid and base neutrals.

Task 6 - Documentation

This task will document all aspects of Phase I including field investigations, laboratory analyses and results, soil sample locations, all data collected and the site topographic plot plan. A draft report will be prepared for Bosetti Properties & Investments review. The report will include a map delineating contaminated areas. The prime basis of the report will detail the corrective action plan. Review comments will be incorporated into the final report.

SCHEDULE

Work on Phase I of the project can begin within three days after receiving authorization to proceed. The work performance will be completed in four to five weeks. The schedules for Phases II and III are contingent upon the results of Phase I.

BUSINESS PROPOSAL

IT offers to perform the engineering services described on a time-and-material basis under the terms and conditions of the attached Professional Services Agreement. Our fees and charges will be billed at the rates described in the attached Engineering Services Rate Schedule. Charges for the professional services will be determined by multiplying the time actually spent by each individual during the project by the respective charge defined in the attached Engineering Services Rate Schedule.

Our cost estimate for performance of the services described in the work scope is based on IT's experience with similar projects and the assumptions stated herein. However, because the information presently available to us is limited, the project cost estimate should not be taken to be definitive. Our cost estimate for Phase I Environmental Investigation is broken down as follows:

Professional Engineering Services .		•	•		•	•	•	•	•	\$20,000.00
Laboratory Analyses		•	•		•		•	•	•	. 5,600.00
Drum Staging (Materials and Expenses)) .	•	•			•	•	•	•	. 3,300.00
Survey and Mapping		•	•		•	•	•	•		6,100.00
•										
		7	nΤ	ΔΙ						\$35,000,00

Contingent on actual field conditions the above cost estimate may be somewhat lower or even higher. If in the course of project performance, IT anticipates exceeding this estimated cost, Bosetti Properties & Investment will be contacted to determine the appropriate course of action.

If you have any questions regarding the proposal, please feel free to call me at 415-372-9100.

Please return one signed copy of the Professional Services Agreement to IT if

you accept this proposal.

Sincerely,

Russell J. Enos

Manager, FAS

AG:jaa

FAS:0814

Attachment

REFERENCE #12

DEPARTMENT OF HEALTH SERVICES TOXIC SUBSTANCES CONTROL DIVISION 2151 BERKELEY WAY, ANNEX 7 BERKELEY, CA 94704



March 22, 1988

Ms. Sahnta Panutti 154 Oak Court Menlo Park, CA 94025

Dear Ms. Panutti:

SALE OF DRUMS AND LAB CHEMICALS FROM THE PROTOMOLD SITE

The staff of the Department of Health Services (the Department) has reviewed your request to sell the drums labeled Sodium Perborate Tetrahydrate and laboratory chemicals from the PROTOMOLD site. After reviewing the supporting analytical data, the Department has determined that the lab chemicals and drums of Sodium Perborate Tetrahydrate are non-hazardous and may be sold as such.

Additionally, your request during our meeting on March 7, 1988, to store the drums of Sodium Perborate Tetrahydrate at another location pending their sale is approved. Please inform the Department when you complete the sale or relocation of the lab chemicals or drums of Sodium Perborate Tetrahydrate.

If you have any questions please call me at (415) 540-2090.

sincerely,

al Warge

Al Wanger

Hazardous Materials Specialist

Site Mitigation Unit

North Coast California Section Toxic Substances Control Division

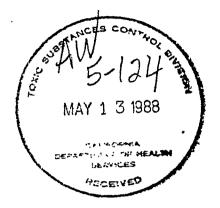
cc: Jim Reid, IT Corporation

REFERENCE #13



May 12, 1988

Mr. Al Wanger Department of Health Services 2151 Berkeley Way Berkeley, CA. 94704



Subject: Pannutti/Protomold De-listing

ITC Project No. 480017; File No. 86-0004

Dear Mr. Wanger:

This letter and enclosures are being submitted to the DHS to help expedite the "de-listing" of the Pannutti/Protomold site. As per agreement between IT Corporation and the DHS, the following action items were to be addressed for site remediation and de-listing:

Identification, analysis and disposal of chemical storage drums located on site.

Identification of sites of possible soil contamination, soil analysis, and plans for soil remediation, if necessary.

Identification and disposal of laboratory chemicals.

Removal of various commercial products remaining from past on-site manufacturing processes.

Identification, Analysis and Drum Disposal:

A topographic map of the site was prepared and the drum areas segregated into five locations. The drums were labeled and removed to a staging area. The staging area was covered with visqueen to avoid ground contamination from leaks or spillage. At the staging area, drums were visually inspected, opened, and contents described. Samples were taken from each drum using a glass thieving rod. The samples were categorized and segregated according to physical inspection. "Haz-cat" testing was performed on disparate samples. "Haz-cat" results were used as a qualitative measurement of compatability for compositing samples. The drum samples were sent to the IT Vine Hill Laboratory, composited and run through a "predisposal" suite of analyses. The "predisposal" analyses were used to determine disposal sites. The drum disposal was seperated into three categories:

1. Incineration

Composite SA-E-1 liquids showed high levels of phenolic compounds. All drums used to make up the composite were resampled specifically for phenols and the drums which tested positive were marked for incineration. The oil containing drums from area E were sampled and analyzed for PCBs. Even though the initial predisposal sample from these drums showed 1.3 ppm PCBs, subsequent analysis specifically for PCBs was negative. Since the results were negative, it was decided that these drums would not need to go for incineration. All drums earmarked for incineration have been profiled for disposal at the ENSCO, Inc. site in El Dorado, Arkansas. These drums have been placed in 85 gallon overpack drums and are as of this date still on site. These drums wil be removed by May 20, 1988.

2. Liquid

All liquids not containing phenolics were siphoned into a vacuum truck and sent to Gibson Oil in Bakersfield, California for disposal.

3. Solids

All solids were emptied from the drums and placed in a lined bin. The drums were washed out (liquid from washout was included in the Gibson Oil disposal), crushed and placed in the bin. This waste was profiled for disposal at the Casmalia, California hazardous waste disposal site. The bin is sealed and still remains on site as of this date. The bin will be removed by May 20, 1988.

Identification of Sites of Possible Soil Contamination, Analysis, Remediation:

After discussions with the DHS, it was decided that soil samples would be taken in areas where drums containing PCBs and phenolics were found. Initially Area E was indicated for PCB testing and Area B for phenols. At the suggestion of the DHS, surficial samples were taken in Area E in spots where visual oil spillage had occured. Four surface scrapes were taken, composited in the field and analyzed for PCBs. Area B was sampled in two locations at a depth of 4' to 4'6" using a stainless steel auger. The samples were field composited and tested for phenols. Upon review of the liquid phenol analysis, it was determined that soil samples should also be taken in Areas C and D. Four surface scrapes were taken at each area and field composited. These areas were then tested for phenols. All soil sample results were negative, therefore no soil remediation is deemed necessary.

Identification and Disposal of Laboratory Chemicals:

A lab inventory was taken. With DHS approval, the estate was given permission to sell the lab contents. The contents were sold to a Mr. Ed Mesiti and removed on March 15, 1988.

Removal of Commercial Products:

The Pannutti's have removed all products of the past manufacturing processes. These items included boxes of soaps, toilet cleaners, deodorizers, etc.

Enclosed for your review are the following documents:

Enclosure 1 - Master Sample Log

Enclosure 2 - Analytical Results For All Samples

If you should have any questions or require additional information, please contact me at (415)372-9100. A full report will be issued upon completion of all disposal.

Sincerely,

James C. Reid

IT Environmental Specialist

james C: Keil

Enclosures

ENCLOSURE 1
MASTER SAMPLE LOG

MASTER SAMPLE LOG

PANNUTTI/PROTOMOLD

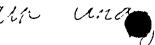
ITC PROJECT NO. 480017

SAMPLE ID NO.	LOCATION	DESCRIPTION	ANALYTICAL PARAMETERS	RESULTS
SA-E-1	Drums	Liquid/Sludge Lab Composite of Drums A-4, A-8, A-10, A-13, B-2, B-3, B-13, B-22, B-23, D-1	Predisposal Analysis	See page 1 of enclosure 2
SA-B-22	Drums	Liquid/Sludge Lab Composite of Drums A-3, A-6, A-7, B-16, B-20, B-24, B-25, B-29, E-1, E-3, and Composite E (Field Composite of E-2, E-4, E-5, E-6, E-7)	Predisposal Analysis	See page 2 of enclosure 2
SA-B-25	Drums	Semi-Solid Lab Composite of Drums A-11, B-1, B-8, B-9, B-10, B-12, B-14, B-15, B-17, B-18, B-19, B-32, D-20	Predisposal Analysis	See page 3 of enclosure 2
SA-C-4	Drums	Solid Field Composite of Drums C-4, C-11, D-9 Labeled Sodium Perborate Tetrahydrate. Representative of 28 Drums.	Predisposal Analysis	See page 4 of enclosure 2
SA-B-21	Drums	Fuming Liquid	Predisposal Analysis	See page 5 of enclosure 2
03101225	Drum E-3	0i1/Sludge	Polychlorinated Biphenyls	See page 6 of enclosure 2
03101230	Drum E-1	Oil/Sludge, Field Composite of E-1, E-2, E-4, E-5, E-6, E-7	Polychlorinated Biphenyls	See page 6 of enclosure 2

SAMPLE ID NO.	LOCATION	DESCRIPTION	ANALYTICAL PARAMETERS	RESULTS
03110255	Area E	Discolored Surface Soil, 4 to 1 Field Composite	Polychlorinated Biphynyls	See page 6 of enclosure 2
03101330	Area B	Soil 4' to 4'6" Depth, 2 to 1 Field Composite	Phenols	See page 6 of enclosure 2
03151135	Drum B-2	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151215	Drum B-23	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151220	Drum D-1	Liquid/Sludge	Pheno1s	See page 7 of enclosure 2
03151155	Drum A-8	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151205	Drum B-3	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151235	Drum B-22	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151145	Drum A-4	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151230	Drum A-10	Liquid/Sludge	Phenols	See page 7 of enclosure 2
03151200	Drum B-6	Liquid/Sludge `	Phenols	See page 7 of enclosure 2
P04061100	Area A	Surface Soil 4 to 1 Field Composite	Pheno1s	See page 8 of enclosure 2
P04061110	Area B	Surface Soil 4 to 1 Field Composite	Pheno1s	See page 8 of enclosure 2

ENCLOSURE 2 ANALYTICAL RESULTS

FLR:0039/05128



IT CORPORATION ANALYTICAL REPORT

WORL DRDER # M7-12-023 JOB # 89960

SAMPLE # 01 OF 1

Generator name: Waste description: Generatino Process: Volume / frequency:

IT-FAS MARTINEZ SA-E-1 LICUIDS

PANNUTTI/PROTO MOLD

NA

TECT	RESULT	LINITTO	RESULTS BY	CC ANALVET	=	
TEST HCVP	. <u>RESULT</u>	UNITS pom	TEST	RESULT	NNITS	
DENSITY	950	G/L	FORMALDEHYDE	NA	DDW OIAT 12	
PENSTIT	7.0	pH	PCB	ND:1.0	mg/kg	•
NORMALITY	<0.1	N	PHENOL	* 5400	mg/r.g mg/l	
SON	0	%	CRESOL	, NA	DDW Wdv I	
CN	ND @ 5		HALOGENATED	× 940	mg/l	
SULFIDE	*ND @ 2	ppm	HEUGENHIED	* 700	mu/ I	
FORMALDEHYDE	300 E	ppm	DECULTO BY	TO ANALVET	_	
AMMONIA	<200	ppm		IC ANALYSI NA		
FLUORIDE	NA NA	bbw	CN SULFIDE	NA NA	D D W	
XS OXIDANT	ND	bbw	FLUORIDE		pbw	
FLASHPOINT	22	DEG/C		NA NA	bbw	
AQUEOUS	20	7 %	PHENOL	NA	obw	
	22	7.	DEELU TO DV	TEAD CNALW	C T C	
SOLID OIL	20 20	/. %	SESULTS BY	TIME HMALY	212	
POLAR	14	%. %.	TEST	FESULT	UNITED	
	14	% %	<u>1E31</u> T1	ND @ 10	UNITS	
NONFOLAR	*	/•				
HALOGENATED FHENOL	*		As	ND @ 10 ★ ND @ 2	•	
LUEMOF	*	bow	Hg Se	ND 3 10	• •	
r.	OMMERCE			ND @ 10	•	
	DMMENTS	_4 ^_0	, ₽b	ND @ 10	•	
Composite (Cd *	ND @ 10		
A-10. A-13. B-22. B-23		, 5-0.5-1.	5 Ni Cr	ND @ 10		
* Sulfide i			Cr+6	NA ND 6 10		
4 pointine 1	III OII- ND	•	Cr +o Be	ND @ 1.0	ppm	
			Cu	ND @ 10		
* Haby co	old vapor		Fe	NA NA		
, 110 D C	ard Ashou		Co	NA NA	bbw	
:	^		Zn	ND @ 10	ppw ppw	
	(1)		211	145 = 10	ppm	
LAB MANAGER:	(14) 614	- 71 May Co	HA DATE: 8	120.27		
CHD GHGHOCK.	Tyrong	20000	<u> </u>	<u> </u>		
======================================	=========	=======================================		=======================================	======	==========
ACCEPT/REJECT:	:	REAS	ON:			·
TSDF MANAGER:				DATE:		•
TSD FACILITY:		SFE	CIAL SCHEDULING			•
	**************************************					-
TREATABILITY	/ PLACEMEN	Т: .				<i>;</i>
MATERIAL PROPERTY AND ASSESSMENT OF THE PROPERTY OF THE PROPER						

IT COFFORATION ANALYTICAL REPORT

WORF ORDER # M7-12-021 JOB # F7958 SAMPLE # 01 OF 1

Gererator name:
Waste description:
Generating Frocess:
Volume / frequency:

IT-FAS MARTINEZ SA-B-22 LIQUIDS PANNUTTI/FROTO MOLD

NΑ

TEST HCVP DENSITY PH NORMALITY SON CN SULFIDE FORMALDEHYDE AMMONIA	RESULT 0 1000 5.4 .1 ND 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	UNITS POM POM POM POM POM POM POM PO	TEST FORMALDEHYDE FCB FHENOL CRESOL HALOGENATED	GC ANALYSIS RESULT NA 1.3 * ND: 25 NA * ND: 25 IC ANALYSIS	UNITS ppm mg/lg ppm mg/l	
FLUORIDE X3 OXIDANT FLASHPOINT ACUEOUS SOLID OIL	NA ND 47 CC 50	ppm DEG/C % %	SULFIDE FLUORIDE PHENOL RESULTS BY	NA NA NA ICAF ANALY!	SIS bbw bbw bbw	
FOLAR NONFOLAR HALOGENATED PHENOL	% **	n n n n	TEST T1 As Hg Se	RESULT ND @ 10 ND @ 10 + ND @ 2 ND @ 10	ppm ppm	
COMFOSITE C A-7. B-16, B-29. E-1,	DMMENTS DF SA #: A B-20, B-2	4. B-25,	F b C a N 1	ND @ 10 ND @ 10 ND @ 10 ND @ 10 NA ND @ 1.0	bbw bbw bbw bbw	
* Hg by co	old vapor	7 (Nus	Cu Fe Co Zn	ND @ 10 NA ND @ 10	ppm ppm ppm	
ACCEPT/REJECT:		FEAS	=======================================	========	======	:======================================
TSDF MANAGER: TSD FACILITY:		•	CIAL SCHEDULING	DATE: RED.:		- - -,
TREATABILITY	/ PLACEMEN	IT:				

IT CORFORATION ANALYTICAL REPORT

WOR! ORDER # M7-12-020 JOB # 89957 SAMPLE # 01 OF 1

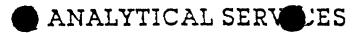
Generator name:
Waste description:
Generating Process:
Volume / frequency:

IT-FAS MARTINEZ SA-B-25 SEMI SOLID FANNUTTI/FROTO-MOLD NA

RÉSULT TEST UNITS RESULTS BY GC ANALYSIS HCVP <u>4</u>0 ppm TEST PESULT UNITS DENSITY 1090 G/L FORMALDEHYDE NA ppm 11.9 FH DН PCB NA mg/kg NA PHENOL NORMALITY 0.6 N ppm % CRESOL NA SON 0 ppm * ND/.25 HALOGENATED CN ND @ 5 ppm mq/1SULFIDE ND @ I FORMALDEHYDE ND @ 5 RESULTS BY IC ANALYSIS DDM ND @ 15 AMMONIA CN NA DOM maa FLUORIDE SULFIDE NA NA \square \square \square SLIGHT NA XE OXIDANT FLUORITE DDM 114 - ppm FLASHPOINT NA DEG/C PHENOL •, 95 ADUEDUS 5 SOLID RESULTS BY ICAP AMALYSIS OIL TRACE ND RESULT POLAR TEST UNITS ND @ 10 NONFOLAR ND Tl DDM HALDGENATED ND ND @ 10 ⊊یک DDM ND @ 5 pom ← ND G D PHENDL HC COM ND @ 10 Se $r \supset m$ COMMENTE Pb· ND @ 10 \square \square mCOMPOSITE OF SAMPLE # A-11. Ca ND @ 14 FDM 81,8,9,10.12,14,15,17,18.19. ND @ 10 N₂ DDM32 % D20. Cr-ND @ 10 pom Cr+6 NA DDM₽∈ ND @ 1.0 pom Cu ND @ 10 DDM Fe NA Hg by cold vapor pom Co NA ppm Zn ND @ 10 ppm DATE: 12-10-87 ________ ACCEPT/REJECT: REASON: TSDF MANAGER: DATE: TSD FACILITY: SPECIAL SCHEDULING REQ.: TREATABILITY / FLACEMENT :



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CERTIFICATE OF AMALYSIS

Service Jim Reid

January 8, 1988

RE: IT FAS - Pannutti/Protomold

Sodium perborate tetrahydist

drunc

St # 54

SPT Composite

from C-4, D-9, C-11 M7-12-022

7. 12/02/87 480017.01.05.03 89959 TEST RESULT UNITS RESULTS BY GC ANALYSIS 30 ppm RESULT UNITS HCVP TEST DENSITY 1000 G/L FCRMALDEHYDE NA ppm 9.6 pH NA mg/kg PH PCB NA ppm NORMALITY NA N PHENOL જ CRESOL SON NAppm CN ND @ 5 HALOGENATED ND @ 2 SULFIDE ppm RESULTS BY IC ANALYSIS FORMALDEHYDE ND @ 5 mqq ND @ 15 AMMONIA ppm CN NA ppm NA ppm FLUORIDE NA SULFIDE XS OXIDANT SLIGHT FLUORIDE NA ppm DEG/C PHENOL NA ppm FLASHPOINT NAAQUEOUS ND RESULTS BY ICAP ANALYSIS 100 SOLID RESULT UNITS TEST POLAR ND ND @ 10 NONPOLAR ND T1mqq ND @ 10 HALOGENATED ND As ppm * ND @ 2 .ppm PHENOL ND @ 5 ppm Hq Se ND @ 10 ppm COMMENTS Pb ND @ 10 ppm ND @ 10 NO FREE LIQUIDS Cd SA # C4 - Composite of C4, D-9, C-11 Ni ND @ 10 ppm Cr ND @ 10 ppm Cr+6 NA ppm ND @ 1.0 Be ppm Cu 30 ppm Fe * Hg by cold vapor NAppm Co NA ppm ND @ 10 ppm

15 of t, that this report truly represents the finding of work partermed by me or under my direct supervision. 1. Flaviowed and Approved

Show K. Co

Rhonda Biederman Laboratory Manager

Tom Cors
Data Management Supervisor

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ANALYTICAL SERVES

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CERTIFICATE OF ANALYSIS

· Jim Reid

January 8, 1988

RE: IT FAS - Pannutti/Protomold

. So # (.2)

M7 - 12 - 022

12/02/87 480017.01.05.03 89959 TEST RESULT UNITS RESULTS BY GC ANALYSIS 0 ppm TEST RESULT UNITS HCVP FORMALDEHYDE NA ppm NA G/L DENSITY 12.5 pH 9 N NA mg/kg PH PCB NORMALITY NA ppm PHENOL ND % NA ppm SON CRESOL HALOGENATED * ND<25 mg/l CN ND @ 5 ppm ND @ 2 ppm SULFIDE RESULTS BY IC ANALYSIS FCRMALDEHYDE ND @ 5 ppm <200 ppm AIMONIA CN NA ppm NA ppm NA ppm SULFIDE FLUORIDE NA ppm MS OMIDANT FLUORIDE POS. FLASHPOINT NA DEG/C PHENOL NA ppm AQUEOUS >98 % SOLID ~2 % RESULTS BY ICAP ANALYSIS ND % CIL ND % TEST RESULT UNITS POLAR NONPOLAR ND % \mathtt{Tl} NA ppm HALOGENATED As NA ppm ND @ 5 ppm PHENOL Hg NA ppm Se NA ppm COMMENTS Pb NA ppm METALS - Fuming on exposure to Cd NA ppm open air - reacted vigorously Ni NA p with strong acid NA ppm Cr SA # B21 Cr+6 NA ppm NA ppm Be NA ppm Cu * Hg by cold vapor Fe NA ppm Co NA ppm

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Rhonda Biederman

Laboratory Manager

I. Feelewed and Approved

Flore R. ?.

Tom Cors
Data Management Supervisor

or a larger medicine



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896 Waterbird Way • Martinez California 94553 • 415 228-5806

CERTIFICATE OF ANALYSIS

Prepared For

Jim Reid

Date March 17, 1988

RE: Pannutti/Protomold

M8-03-064 Date Received PO Number Job Number 480017.01.01 90354 03/11/88

We received two liquid & 2 soil samples for the following analysis. The results are as follows.

ORGANICS ANALYSIS METHOD 8080 **PCBs**

СОМРОИИД	03101225 DRUM E-3	03101230 DRUM E-1	DETECTION LIMIT	03101255 AREA E	DETECTION LIMIT	UNIT
Arochlor-1016 Arochlor-1221 Arochlor-1232 Arochlor-1242 Arochlor-1248 Arochlor-1254 Arochlor-1260	ND<1.0 ND<1.0 ND<1.0 ND<1.0 ND<1.0 ND<1.0 ND<1.0	ND<1.0 ND<1.0 ND<1.0 ND<1.0 ND<1.0 ND<1.0 ND<1.0	1.0 1.0 1.0 1.0 1.0	ND<0.5 ND<0.5 ND<0.5 ND<0.5 ND<0.5 ND<0.5	0.5 0.5 0.5 0.5 0.5 0.5	mg/kg mg/kg mg/kg mg/kg mg/kg mg/kg

ANALYSIS	03101330 AREA B	UNIT	METHOD:
Phenols	ND<1	mg/kg	8040

I certify that this report truly represents the finding of work performed by mic or under my direct supervision Rhonda Biedermann

Analytical Laboratory Manager

Revieword and Approved

Tom Cors

Data Management Supervisor

Approved by the California State Department of Health



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896 Waterbird Way • Martinez California 94553 • 415-228-5806

CERTIFICATE OF ANALYSIS

Prepared For Jim Reid Date March 22, 1988

RE: Pannutti/Protomold

M8-03-082 Date Received PO Number Job Number 90368 480017.01.01 03/15/88

We received nine samples for the following analysis. The results are as follows.

ANALYSIS	03151135 01A	03151215 02A	03151220 03A	03151155 04A	03151205 05A	03151235 06A	UNIT
Phenols Cresols	NEG NEG	NEG NEG	7076 49947	252 ND<50	NEG NEG	50 59	mg/l
ANALYSIS		03151145 07A		03151230 08A		03151200 09A	UNIT
Phenols Cresols		128 ND<50		162 ND<50		81 26	mg/l mg/l

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WORK 12 Corned by the or under my direct supervision Rhonda Biedermann

Analytical Laboratory Manager

Reviewed and Approved

Tom Cors

Data Management Supervisor

Approved by the California State Department of Health



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CERTIFICATE OF ANALYSIS

Prepared for:

IT Corporation

4585 Pacheco Blvd. Martinez, CA 94553

Attn: Jim Reed

Date:

April 19, 1988

Date Received:

April 7, 1988

P O. Number

480017

Job Number

45832/sds

Pannutti

Two (2) soil samples

The samples were analyzed for phenols using Method 420.1. The results are as follows.

Milligrams Per Kilogram

Sample	Phenols
P04061100 P04061110	ND<2.5

ND - This compound was not detected; the limit of detection for this analysis is less than the amount stated in the table above.

I certify that this report truly represents the finding of work performed by me or under my direct supervision

Mary Hammons Group Leader Reviewed and Approved

Ken Faust

Technical Director

Accredited by the American Industrial Hydrene Association